

Exhibit A

Cap 111 Enterprises LLC v. Manhattan Beer Distributors, LLC et al
7:22-cv-01408-CS-AEK
Wittels McInturff Palikovic Time Records

Date	Atty	Time	Description
12/4/2021	SLW	0.7	Conferring with Connie Petrovich, owner of Armonk House restaurant (Cap 111 LLC) regarding inter alia [REDACTED]
12/6/2021	JLH	0.2	Calls w SLW and EDR re sending retainer to new CL
12/6/2021	SLW	0.9	Further communications with Connie P regarding [REDACTED], and initial review Cap 111 documents
12/7/2021	EDR	0.3	Finalize and send retainer letter to client
12/7/2021	EDR	0.4	Call with client regarding [REDACTED]
12/7/2021	SLW	1.9	Researching Manhattan Beer business and New York state liquor and beverage regulations and law
12/11/2021	SLW	0.6	Upon receipt, analysis of M Beer invoices to Armonk House
12/11/2021	SLW	1.5	Further researching NY state beverage deposit law and regulations
12/20/2021	SLW	0.3	Conferring with Connie P re [REDACTED]
1/8/2022	SLW	4.7	Travel to [REDACTED]
1/26/2022	SLW	0.3	Status call with Connie P re case
2/6/2022	SLW	0.4	Further communication with Connie P re review [REDACTED]
2/7/2022	SLW	0.1	Conferring with EDR and JBM re strategy
2/8/2022	EDR	1.3	Research [REDACTED]
2/8/2022	SLW	1.6	Conducting legal research into GBL tolling issues, and communicating with team re issues
2/9/2022	EDR	1.9	Research negligent misrepresentation cause of action for complaint
2/9/2022	EDR	2.4	Research fraudulent concealment cause of action for complaint
2/9/2022	EDR	1.1	Research NY GBL 349 cause of action for complaint
2/9/2022	EDR	0.8	Research unjust enrichment cause of action for complaint
2/9/2022	EDR	2.3	Research common law fraud cause of action for complaint
2/9/2022	EDR	1.2	Draft introduction to Complaint
2/9/2022	SLW	0.6	Further review of Cap 111 invoices, and communication with EDR and JBM re deposits, and review initial draft of Complaint
2/9/2022	SLW	1.2	Further legal research on [REDACTED]
2/10/2022	EDR	0.5	Conference with S. Wittels regarding complaint
2/10/2022	EDR	1.3	Legal research regarding claims to add to complaint
2/10/2022	SLW	0.9	Conferring further with Connie P re [REDACTED], and communicating updated information to team; conferring with [REDACTED]
2/11/2022	SLW	1.9	Legal research re [REDACTED]

Date	Atty	Time	Description
			[REDACTED]
2/13/2022	SLW	0.7	Researching [REDACTED]
2/14/2022	EDR	2.3	Further research of potential causes of action
2/14/2022	SLW	0.7	Meeting with Connie P and review additional Cap 111/M Beer documents
2/14/2022	SLW	0.9	Review legal analysis by team, and conducting additional research into outstanding pleading issues
2/15/2022	EDR	1.8	Follow up research of potential causes of action
2/15/2022	SLW	0.4	Conferring with EDR regarding ongoing pleading issues, and continued review and edit of draft complaint
2/15/2022	SLW	1.5	Upon receipt of [REDACTED]
2/16/2022	SLW	2.2	Drafting complaint Including background, allegations, and selection of invoices for incorporation by reference into complaint
2/17/2022	EDR	1.6	Draft causes of action section of complaint
2/17/2022	EDR	1.1	Draft named plaintiff allegations for complaint
2/17/2022	EDR	2.4	Evaluate and address SLW comments in complaint
2/17/2022	EDR	0.4	Draft civil cover sheet for complaint
2/17/2022	EDR	0.7	Prepare exhibits to complaint
2/17/2022	SLW	0.7	Researching media for potential press release
2/17/2022	SLW	1.5	Finalizing edits to draft complaint and [REDACTED]
2/18/2022	EDR	0.6	Draft and file request for service of summons
2/18/2022	EDR	3.3	Revise and finalize complaint for filing
2/18/2022	EDR	0.5	File complaint and supporting documents
2/18/2022	SLW	1.3	Drafting and circulating press release re case and further researching appropriate media for distribution
2/18/2022	SLW	2.1	Assisting in final review and edit of Summons, Civil Cover Sheet and Complaint for filing in SDNY
2/18/2022	TP	0.8	Reviewing sample invoices and internal correspondence re same
2/18/2022	TP	1.1	Reviewing complaint.
2/19/2022	SLW	0.7	Finalizing press release for circulation to media, and conferring with client Connie P re status
2/22/2022	EDR	1.3	Draft press release
2/22/2022	JLH	0.2	Call w JBM re serving complaint; related internet research
2/22/2022	JLH	0.2	Calls w potential process servers
2/22/2022	JLH	0.2	Call w SJR re paying process server; paying process server

Date	Atty	Time	Description
2/22/2022	JLH	0.5	Preparing packets for service; drafting and sending related email to process server
2/22/2022	SLW	0.1	Conferring with attorney Howard Foster
2/22/2022	SLW	2.1	Upon receipt of ECF filings with designation of Judge Cathy Seibel and individual rules, review of rules
2/23/2022	EDR	1.2	Research applicability of RICO
2/23/2022	JLH	0.2	Calls w process server and JBM re affidavits of service
2/23/2022	SLW	0.3	Review filed media articles re case and communicating with EDR re strategy for WMP website; review ECF filing of service accepted by Defendant
2/24/2022	EDR	0.6	Call regarding [REDACTED]
2/24/2022	JLH	0.7	Filing summons, related emails w JBM and Process Server
2/24/2022	SLW	0.1	Review communication [REDACTED]
2/24/2022	SLW	0.6	Conferring with [REDACTED]
2/25/2022	EDR	2.6	Research applicability of RICO
2/27/2022	SLW	0.3	Communicating with Connie P re [REDACTED]
3/2/2022	SLW	1.3	Further communication with [REDACTED]
3/4/2022	EDR	2.5	Due diligence on possible RICO claim
3/4/2022	SLW	0.1	Communicating with team regarding potential amendment to complaint
3/4/2022	SLW	0.4	Further meeting with [REDACTED]
3/8/2022	EDR	0.5	Draft blurb for beverage industry magazine
3/9/2022	SLW	0.1	Communicate with [REDACTED]
3/9/2022	SLW	0.3	[REDACTED]
3/9/2022	SLW	0.3	Conferring with [REDACTED]
3/9/2022	SLW	1.3	Upon receipt of communication from new defense counsel Peter Ripin, conferring with counsel, review of Defendants' proposed letter for extension to J. Seibel to respond to complaint, revising letter and communicating with defense counsel, and review of court ECF order granting extension
3/12/2022	SLW	0.1	Communicating [REDACTED]
3/12/2022	SLW	0.4	[REDACTED] review thereof
3/13/2022	SLW	0.1	Communicating with [REDACTED]
3/14/2022	SLW	0.1	Communicating with [REDACTED]

Date	Atty	Time	Description
3/14/2022	SLW	1.3	[REDACTED]
3/15/2022	EDR	0.6	Research [REDACTED]
3/15/2022	EDR	1.1	Calls with potential clients
3/15/2022	SLW	0.1	Review of corporate disclosure, statement by MB, as well as notice of appearance of new defense counsel
3/15/2022	SLW	1.3	Researching background on [REDACTED]
3/15/2022	SLW	1	Conferring with witness and potential class [REDACTED]
3/16/2022	SLW	1.6	Meeting [REDACTED]
3/17/2022	SLW	0.4	Upon receipt from of additional invoices with hidden deposit charge from [REDACTED]
3/18/2022	SLW	0.1	Conferring with named plaintiff Connie P re [REDACTED]
4/1/2022	SLW	0.3	Conferring with Joe Bueti and Todd Albright, owners of Village Social [REDACTED]
4/3/2022	SLW	0.3	Communicating with potential class member [REDACTED]
4/4/2022	EDR	0.4	Draft retainer agreement
4/9/2022	SLW	0.1	Consider potential expert proposal from [REDACTED]
4/18/2022	EDR	0.2	Analyze Judge's rules regarding response to pre motion letter
4/18/2022	EDR	0.4	Circulate analysis of RICO claims
4/18/2022	EDR	0.8	Conference with S. Wittels, T. Palikovic regarding motion to dismiss
4/18/2022	SLW	0.1	Review of Court's memo endorsement granting Defendant's request for premotion conference, and setting date for parties' briefing
4/18/2022	SLW	1.2	Conferring with Howard Foster regarding potential RICO action, and review summary RICO case results, considering viability of RICO claim
4/18/2022	SLW	2.2	Upon receipt of pre-motion letter from defense counsel Peter Ripkin to Judge Seibel requesting pre-motion conference to dismiss case under Rule 12b1 and 12b6, requesting the court decline jurisdiction under CAFA and dismiss all claims, including GBL 349, negligent misrepresentation, and unjust enrichment, review and analysis thereof
4/18/2022	TP	0.4	Reviewing Complaint in connection with defendants' dismissal arguments
4/18/2022	TP	0.8	Conference with SLW and EDR regarding motion to dismiss
4/18/2022	TP	0.8	Continued research regarding applicability of civil RICO

Date	Atty	Time	Description
4/18/2022	TP	1.2	Reviewing Defendants' letter regarding motion to dismiss and caselaw cited therein
4/18/2022	TP	1.4	Reviewing EDR RICO research and conducting follow up research regarding applicability of RICO
4/19/2022	SLW	2.1	Researching authorities in Manhattan Beer's pre-motion letter, including company arguments that .10 cent charge was result of arm's length bargaining with company's clients
4/21/2022	SLW	1.5	Researching [REDACTED]
4/21/2022	TP	1.4	Reviewing [REDACTED]
4/22/2022	EDR	0.3	Research civil RICO
4/22/2022	SLW	2.2	Conferring with [REDACTED]
4/25/2022	EDR	0.3	Conference B. McInturff regarding opposition to motion to dismiss
4/25/2022	SLW	2.6	Conducting further research into [REDACTED]
4/26/2022	EDR	0.6	Review and analyze Judge Seibel cases involving RICO claims
4/26/2022	EDR	1.1	Research federal question jurisdiction for RICO claims
4/26/2022	EDR	3.2	Research exceptions to CAFA jurisdiction
4/27/2022	EDR	0.7	Conference with B. McInturff, S. Wittels, T. Palikovic regarding amending complaint
4/27/2022	SLW	0.1	Conferring with named plaintiff Connie Petrovich re [REDACTED]
4/27/2022	TP	0.2	Research bottle bill in connection with same
4/27/2022	TP	0.7	Conference with EDR, SLW, and JBM regarding strategy for amending complaint
4/28/2022	EDR	0.2	Call with defense counsel regarding plan to amend complaint
4/28/2022	EDR	0.2	Conference with S. Wittels regarding amended complaint
4/28/2022	SLW	0.6	Prepare for and call defense counsel Peter Ripkin to discuss plaintiffs' proposal that defendant agree to postpone the May 18 pre-motion conference as plaintiff intends to amend complaint
4/29/2022	EDR	0.3	Call with client
5/2/2022	EDR	0.2	Call with opposing counsel regarding motion to dismiss
5/2/2022	EDR	0.5	Calls with clients regarding status of case, documents to collect
5/2/2022	EDR	0.6	Research federal question jurisdiction
5/2/2022	EDR	0.9	Research Bottle Bill and Alcoholic Beverage Control law
5/2/2022	EDR	1.3	Conference with S. Wittels regarding amended complaint

Date	Atty	Time	Description
5/13/2022	EDR	0.5	Review and analyze comments from consultant regarding RICO claim
5/17/2022	EDR	0.2	Call with client
5/17/2022	EDR	4.5	Draft Rule 9(b) allegations for amended complaint
5/17/2022	SLW	2.4	Draft additional causes of action (RICO, Bottle Bill, public nuisance, breach of contract and covenant of good faith and fair dealing) for amended complaint
5/17/2022	SLW	0.3	Confer with [REDACTED]
5/18/2022	EDR	3.3	Draft Amended Class Action Complaint
5/19/2022	EDR	1.4	Revise introduction and parties sections of amended complaint
5/19/2022	EDR	4.1	Research RICO complaints at motion to dismiss stage
5/19/2022	EDR	2.1	Revise racketeering enterprise section of amended complaint
5/19/2022	HF	1.2	Reading RICO complaint and call with Ethan Roman about it.
5/19/2022	SLW	0.1	Upon receipt of communication from [REDACTED], review thereof
5/20/2022	EDR	1.7	Revise racketeering enterprise section of amended complaint
5/20/2022	EDR	3.6	Revise Rule 9(b) allegations for amended complaint
5/23/2022	EDR	3.1	Revise causes of action for amended complaint
5/23/2022	EDR	1.7	Review and revise amended complaint
5/23/2022	SLW	2.1	Review and edit of proposed amended complaint Including additional named plaintiffs, as well as new RICO claim
5/24/2022	EDR	0.5	Analyze edits to Amended Complaint
5/24/2022	EDR	1.2	Conference with S. Wittels regarding Amended Complaint
5/24/2022	SLW	0.3	Conferring with IT expert Boris Shapiro and EDR [REDACTED]
5/24/2022	SLW	4.2	Continued review and edit of proposed amended complaint Including additional named plaintiffs, as well as new RICO claim
5/25/2022	EDR	1.5	Revise Amended Complaint for sending to clients
5/25/2022	EDR	3.3	Revise Amended Complaint
5/25/2022	SLW	0.4	Drafting and sending email to both Village Social Group and Livanos Group [REDACTED]
5/27/2022	EDR	0.3	Conference with S. Wittels regarding Amended Complaint
5/27/2022	EDR	0.6	Revise Amended Complaint
5/28/2022	SLW	0.3	Review communications from both Joe B and Natalie S regarding [REDACTED]
5/28/2022	SLW	0.4	Review multiple communications from IT expert Shaz B and Boris S regarding location of servers
5/30/2022	TP	1.7	Reviewing revisions to amended complaint
5/31/2022	EDR	0.3	Draft and file request for service of summons
5/31/2022	EDR	0.5	Calls with clients regarding [REDACTED]
5/31/2022	EDR	3.9	Revise, finalize and file amended complaint

Date	Atty	Time	Description
5/31/2022	SLW	2.2	Conferring with both [REDACTED] [REDACTED]
6/1/2022	SLW	0.3	Review ECF filing of additional summonses issued to new individual defendants, and review communications from clients re filing amended complaint
6/2/2022	EDR	0.5	Draft letter to Court regarding courtesy copies of Amended Complaint
6/2/2022	EDR	0.6	Draft and serve waiver of service of summons for Defendant McCarthy
6/2/2022	EDR	0.6	Prepare courtesy copies
6/6/2022	EDR	0.2	Correspondence with clients regarding [REDACTED]
6/6/2022	EDR	0.2	Correspondence with defense counsel regarding time to respond to First Amended Complaint
6/6/2022	EDR	1.1	Prepare and send courtesy copies of First Amended Complaint to Court
6/6/2022	SLW	0.3	Review and analysis of [REDACTED] [REDACTED]
6/6/2022	SLW	1.2	Upon receipt of communication stating all Defendants would accept service if Plaintiffs granted Defendants until September 30 to answer or move, responding to Peter R stating extension was too extensive and requesting meet and confer on compromise proposal
6/10/2022	EDR	0.2	Draft waiver of service of summons for Defendant McCarthy
6/10/2022	EDR	0.3	Draft email to defense counsel regarding deadline to respond to First Amended Complaint
6/10/2022	SLW	0.4	Consider request by defense counsel Peter Ripkin concerning Defendants' timing and response to first amended complaint on behalf of individual defendants, and review and edit of proposed draft email response
6/13/2022	EDR	0.3	Correspondence with defense counsel regarding time to respond to First Amended Complaint
6/14/2022	EDR	0.2	Revise letter to Court regarding time to respond to First Amended Complaint
6/14/2022	SLW	0.2	Review defendants' draft letter to court regarding extension and defendants' agreement to accept service for additional defendants Bergson and McCarthy
6/15/2022	EDR	0.2	Correspondence with defense counsel regarding time to respond to First Amended Complaint
6/15/2022	EDR	0.3	File McCarthy waiver of service form
6/15/2022	EDR	0.5	Revise letter to Court regarding time to respond to First Amended Complaint
6/15/2022	SLW	0.2	Review ECF order granting defendants letter motion for time to answer first amended complaint until 9-1-22

Date	Atty	Time	Description
7/11/2022	SLW	0.9	[REDACTED]
7/12/2022	EDR	0.6	Draft litigation hold
7/18/2022	SLW	0.4	Editing draft litigation hold letter to clients and circulating for further comment
7/21/2022	EDR	0.2	Call with client regarding [REDACTED]
7/21/2022	EDR	0.2	Call with S. Wittels regarding [REDACTED]
7/21/2022	JBM	0.2	Attention to correspondence from D. Hutchinson re settlement data
7/26/2022	SLW	0.7	Drafted and circulated email update to all clients, including Natalie S, Joe B, Todd, and Brandon H at Village Social regarding [REDACTED] [REDACTED]
8/11/2022	EDR	0.5	Call with client regarding [REDACTED]
8/19/2022	EDR	0.3	Conference with S. Wittels regarding document preservation
8/19/2022	EDR	0.7	Draft email to client [REDACTED]
8/19/2022	SLW	0.3	Conferring with EDR regarding [REDACTED]
8/22/2022	EDR	0.2	Conference with S. Wittels regarding [REDACTED]
8/22/2022	EDR	0.2	Draft email to client regarding [REDACTED]
8/22/2022	EDR	0.3	Call with client regarding [REDACTED]
8/22/2022	SLW	0.3	Review [REDACTED] [REDACTED] and conferring with EDR
8/24/2022	EDR	0.4	Finalize and send [REDACTED]
8/25/2022	SLW	0.2	Review of email communication from [REDACTED] [REDACTED]
8/26/2022	EDR	0.5	Draft email to Livanos Group regarding [REDACTED]
8/29/2022	SLW	0.4	Sending email communication to [REDACTED] [REDACTED]
9/1/2022	SLW	0.2	Responding to [REDACTED] [REDACTED]
9/1/2022	TP	0.2	Attention to Defendants' pre motion letter to dismiss
9/2/2022	EDR	0.4	Review and analyze Defendants' pre-motion letter
9/5/2022	SLW	1.8	Upon receipt of defendants' pre-motion letter asserting inter alia Plaintiffs failed to plead separate enterprise between individuals and company, review thereof and defendants' cited cases including Cedric Kushner promotions
9/6/2022	EDR	0.2	Draft email to client regarding [REDACTED]
9/6/2022	EDR	0.3	Conference with S. Wittels regarding pre-motion letter to dismiss amended complaint
9/6/2022	EDR	0.4	Finalize document preservation letter
9/6/2022	EDR	0.8	Draft and send email to consultant regarding RICO claim
9/6/2022	SLW	0.2	Review and approve [REDACTED] [REDACTED]

Date	Atty	Time	Description
9/6/2022	SLW	0.1	Review defense letter to Judge Seibel requesting adjournment of pre-motion conference
9/7/2022	EDR	0.3	Correspondence with client regarding [REDACTED]
9/7/2022	EDR	0.6	Correspondence with RICO consultant regarding pre-motion letter
9/8/2022	EDR	0.5	Calls with [REDACTED]
9/8/2022	EDR	0.9	Research for opposition to pre-motion letter to dismiss
9/8/2022	SLW	1.6	Continued review of RICO enterprise allegations in first amended complaint, and communications with Howard Foster regarding issue, together with further research on [REDACTED]
9/9/2022	EDR	0.2	Research for opposition to pre-motion letter to dismiss
9/9/2022	SLW	0.1	Review Court's order docket 28 adjourning pre-motion conference on motion to dismiss until 10-6-22
9/13/2022	EDR	1.8	Research for opposition to Defendants' pre-motion letter to dismiss
9/14/2022	EDR	2.1	Research for opposition to Defendants' pre-motion letter to dismiss
9/16/2022	EDR	0.3	Draft email to defense counsel regarding Rule 26(f) conference
9/16/2022	EDR	1	Research for opposition to Defendants' pre-motion letter to dismiss
9/20/2022	EDR	0.4	Research judge's rules
9/20/2022	SLW	1.2	Continued updated research on pleading elements required for RICO enterprise allegations.
9/22/2022	EDR	5.7	Research RICO for opposition to defendants' pre-motion letter to dismiss
9/23/2022	EDR	3.9	Draft RICO section of opposition to defendants' pre-motion letter to dismiss
9/23/2022	EDR	1.1	Draft introduction of opposition to defendants' pre-motion letter to dismiss
9/26/2022	EDR	1.3	Research GBL 349 for opposition to defendants' pre-motion letter to dismiss
9/26/2022	EDR	2.1	Draft GBL 349 section for opposition to defendants' pre-motion letter to dismiss
9/26/2022	EDR	3.1	Draft RICO section of opposition to defendants' pre-motion letter to dismiss
9/26/2022	EDR	1.6	Research mail and wire fraud for opposition to defendants' pre-motion letter to dismiss
9/26/2022	EDR	0.3	Revise introduction of opposition to defendants' pre-motion letter to dismiss
9/27/2022	SLW	0.7	Initial review of plaintiffs' opposition to defendants' pre-motion letter
9/28/2022	EDR	0.2	Call with RICO consultant regarding opposing pre-motion letter to dismiss
9/28/2022	EDR	0.8	Research for opposition to pre-motion letter to dismiss
9/28/2022	EDR	0.9	Conference with S. Wittels regarding opposition to pre-motion letter to dismiss
9/28/2022	EDR	2	Revise opposition to pre-motion letter to dismiss

Date	Atty	Time	Description
9/28/2022	HF	0.2	Call with Mr. Wittels and Mr. Roman about [REDACTED] [REDACTED]
9/28/2022	SLW	0.3	Confirming with Howard Foster and EDR regarding potential second amended complaint
9/28/2022	SLW	1.2	Edit Plaintiffs' opposition to Defendants' pre-motion letter
9/29/2022	EDR	0.6	Conference with S. Wittels regarding opposition to pre-motion letter to dismiss
9/29/2022	EDR	0.8	Research for opposition to pre-motion letter to dismiss
9/29/2022	EDR	1.1	Revise Complaint
9/29/2022	EDR	1.2	Evaluate SLW edits to opposition to pre-motion letter to dismiss
9/29/2022	EDR	2.7	Revise opposition to pre-motion letter to dismiss
9/29/2022	EDR	0.5	Finalize and file opposition to pre-motion letter to dismiss
9/29/2022	SLW	1.3	Emailing co-counsel Howard Foster regarding proposed second amended complaint and communicating with EDR regarding RICO pleading issues, and continued edit of opposition to defendants' pre-motion letter including demonstrating why new allegations meet standards for pleading predicate acts, and requesting leave to file Second Amended Complaint in light of defendants' arguments
9/30/2022	SLW	0.9	Further research on RICO count, and conferring with EDR re draft second amended complaint
10/3/2022	EDR	0.5	Conference with S. Wittels regarding amending complaint
10/3/2022	EDR	2.1	Draft second amended complaint
10/3/2022	SLW	1.9	Review and edit of draft second amended complaint
10/4/2022	EDR	2	Conference with S. Wittels regarding amending complaint
10/4/2022	EDR	2.1	Research RICO for second amended complaint
10/4/2022	EDR	3.2	Draft RICO section of second amended complaint
10/4/2022	SLW	0.7	Drafting/sending email to Peter Ripkin and defense counsel regarding meet and confer about second amended complaint before hearing
10/5/2022	EDR	0.3	Conference with S. Wittels regarding amending complaint
10/5/2022	EDR	3.4	Draft second amended complaint
10/5/2022	SLW	1	Preparing for pre-motion conference on defense application for permission to file motion to dismiss FAC before Judge Seibel and reviewing prior pleadings and case law in order to argue effectively
10/6/2022	EDR	0.3	Call with defense counsel
10/6/2022	EDR	0.6	Court conference
10/6/2022	EDR	0.8	Prepare for conference
10/6/2022	EDR	0.9	Draft second amended complaint
10/6/2022	SLW	1.6	Finalized preparation for and appeared before J Seibel on defendants' pre-motion application, and argued for leave to file SAC and commence discovery without waiting for resolution of motion, and updated Foster and team on Court's rulings, and conferred with EDR re SAC
10/7/2022	EDR	2.8	Draft second amended complaint

Date	Atty	Time	Description
10/7/2022	SLW	0.1	Review Court's Minute Entry on rulings regarding defendants' upcoming motion
10/8/2022	SLW	0.3	Communicating with Named Plaintiff Connie P regarding [REDACTED]
10/10/2022	SLW	3.1	Conducting extensive review of [REDACTED], and summarizing helpful evidence to use in SAC
10/11/2022	EDR	1.9	Revise RICO section of second amended complaint
10/11/2022	EDR	2.2	Draft Rule 9(b) allegations for second amended complaint
10/11/2022	EDR	1.9	Draft causes of action for second amended complaint
10/11/2022	SLW	0.6	Review additional summaries from EDR re M Beer witnesses for use in SAC
10/13/2022	EDR	2.5	Generally revise second amended complaint for typos and continuity
10/13/2022	EDR	2.1	Revise RICO section of second amended complaint
10/13/2022	EDR	0.6	Finalize and file second amended complaint
10/13/2022	SLW	1.6	Further editing of Second Amended Complaint adding to RICO counts
10/14/2022	EDR	0.4	Conference with S. Wittels regarding second amended complaint
10/14/2022	SLW	1.3	Conferring with EDR and final edits to Second Amended Complaint
10/14/2022	TP	0.6	Reviewing edits to Second Amended Complaint
10/17/2022	SLW	0.3	Review of follow-up receipt of request from defense counsel for redlined version of Second Amended Complaint, conferring with EDR, and responding to Peter R
10/24/2022	EDR	0.6	Draft initial disclosures
10/26/2022	SLW	0.6	Initial review and edit of Plaintiffs' Initial Disclosures
10/28/2022	EDR	0.3	Call with Village Social regarding [REDACTED]
10/28/2022	EDR	0.3	Call with Livanos Group regarding [REDACTED]
10/28/2022	EDR	0.4	Conference with S. Wittels regarding initial disclosures
10/28/2022	EDR	0.8	Revise and serve initial disclosures
10/28/2022	SLW	0.4	Upon receipt of Defendants' Initial Disclosures from Ben Noran, review and analysis thereof [REDACTED]
10/28/2022	SLW	0.7	Confer with EDR and review/further edit Plaintiffs' Initial Disclosures
11/2/2022	EDR	0.4	Draft status update to clients
11/9/2022	EDR	0.2	Correspondence regarding defendants' motion to dismiss
11/9/2022	EDR	0.3	Correspondence regarding document preservation
11/9/2022	SLW	0.7	Conferring with Bill Livanos and EDR re [REDACTED]
11/10/2022	SLW	0.3	Responding to [REDACTED] and communicating with both Bill L and Margaret A
11/11/2022	SLW	0.2	Upon receipt from Peter R of request to extend time to file motion to dismiss, review and responding thereto

Date	Atty	Time	Description
11/14/2022	EDR	0.2	Correspondence with defense counsel regarding extension for motion to dismiss briefing
11/14/2022	EDR	0.3	Revise letter regarding extension for motion to dismiss briefing
11/14/2022	SLW	0.3	Review defense application to J Seibel for extension to file MTD, and Court order ECF 34 granting request, and review of defense letter seeking reconsideration of J Seibel's denial of enlargement
12/5/2022	EDR	1.1	Draft first set of document requests
12/5/2022	EDR	2.1	Review and analyze motion to dismiss
12/6/2022	EDR	2.3	Draft first set of document requests
12/7/2022	EDR	1.6	Review and analyze past document requests for drafting first set of document requests
12/7/2022	EDR	2.4	Draft first set of document requests
12/7/2022	SLW	0.9	Initial review of defendants' motion to dismiss Second Amended Complaint with supporting memo of law
12/8/2022	EDR	1.9	Draft first set of document requests
12/8/2022	EDR	3.6	Draft first interrogatories
12/9/2022	EDR	1.1	Draft ESI protocol
12/9/2022	EDR	1.4	Draft first set of document requests
12/9/2022	EDR	1.9	Draft first interrogatories
12/9/2022	SLW	0.1	Review Plaintiffs' renewed request for R 26(f) conference
12/9/2022	SLW	1.9	Further analysis arguments and case law cited by Defendants in motion to dismiss, including to dismiss GBL and negligent misrepresentation count
12/12/2022	EDR	1.1	Revise first set of interrogatories
12/12/2022	EDR	1.7	Revise first set of document requests
12/19/2022	SLW	1.3	Review and edit Plaintiffs' First Set of Requests for Production and Interrogatories to MB, and confer with EDR
12/20/2022	EDR	1.2	Research for opposition to motion to dismiss
12/20/2022	EDR	1.8	Revise, finalize and serve discovery requests
12/21/2022	EDR	0.2	Correspondence regarding Rule 26(f) conference
12/27/2022	EDR	2.8	Draft opposition to motion to dismiss
12/29/2022	EDR	1.4	Draft opposition to motion to dismiss
1/3/2023	SLW	0.1	Review defense council Peter Ripkin's request to adjourn scheduled Rule 26 F conference w- counsel until late January
1/3/2023	SLW	0.4	Review Defendants' further edits to R 26F report and discovery production plan schedule and order, and proposed confidentiality agreement
1/4/2023	EDR	1.4	Draft opposition to motion to dismiss
1/5/2023	EDR	4.2	Research defendants' cited cases for opposition to motion to dismiss
1/5/2023	EDR	2.9	Draft opposition to motion to dismiss
1/5/2023	JBM	0.2	Office conferences with EDR regarding MTD brief
1/5/2023	JBM	0.2	Office conference with SLW regarding MTD brief
1/5/2023	JBM	0.5	Email correspondence with team re court conference transcripts and review file in connection with same

Date	Atty	Time	Description
1/6/2023	EDR	0.3	Draft and file notice of appearance
1/6/2023	EDR	3.3	Draft opposition to motion to dismiss
1/6/2023	JBM	0.2	Telephone conference with TP regarding same
1/6/2023	JBM	0.5	Office conference with EDR re MTD assignments and arguments
1/6/2023	JBM	0.7	Telephone conference with SLW and EDR re scheduling issues
1/6/2023	JBM	1	Review and analyze MTD
1/6/2023	JLH	0.1	Review NOA
1/6/2023	JLH	0.1	Call w EDR re brief assignments
1/6/2023	JLH	0.1	Review email from EDR re brief assignments
1/6/2023	JLH	0.2	Case law research re brief assignments
1/6/2023	SLW	0.3	Editing letter to Judge Seibel regarding request to extend plaintiff's time to respond to Defendants' motion to dismiss
1/6/2023	TP	0.2	Conference with JBM regarding motion to dismiss tasks
1/6/2023	TP	0.3	Reviewing first set of discovery requests
1/6/2023	TP	0.6	Attention to Defendants' and Plaintiffs' initial disclosures
1/6/2023	TP	1.6	Review and analyze motion to dismiss and cases cited
1/9/2023	EDR	7.2	Draft opposition to motion to dismiss
1/9/2023	EDR	1.2	Draft legal standard for opposition to motion to dismiss
1/9/2023	EDR	0.7	Draft parties section of opposition to motion to dismiss
1/9/2023	EDR	5.3	Draft RICO section of opposition to motion to dismiss
1/9/2023	JLH	2.8	Research re GBL section of MTD oppo
1/10/2023	EDR	0.1	Call with JLH re GBL section of opposition to motion to dismiss
1/10/2023	EDR	2.4	Research for RICO section of opposition to motion to dismiss
1/10/2023	EDR	4.9	Draft RICO section of opposition to motion to dismiss
1/10/2023	JLH	0.1	Call with EDR re GBL section of MTD oppo
1/10/2023	JLH	0.3	Internet research re Manhattan Beer
1/10/2023	JLH	0.6	Case law research re GBL section of MTD oppo
1/10/2023	JLH	1.1	Case law research re GBL section of MTD oppo
1/10/2023	JLH	1.7	Drafting GBL section re MTD oppo
1/10/2023	JLH	3.5	Drafting GBL section re MTD oppo
1/11/2023	EDR	1.2	Research for RICO section of opposition to motion to dismiss
1/11/2023	EDR	2.3	Draft RICO section of opposition to motion to dismiss
1/11/2023	EDR	4.9	Research Rule 9(b) allegations for opposition to motion to dismiss
1/11/2023	JLH	0.5	Research re GBL section of MTD oppo
1/11/2023	JLH	1.1	Drafting GBL section re MTD oppo
1/11/2023	JLH	1.9	Drafting GBL section re MTD oppo
1/11/2023	JLH	3.2	Drafting GBL section re MTD oppo
1/12/2023	EDR	5.4	Draft Rule 9(b) section of opposition to motion to dismiss
1/12/2023	EDR	1.7	Draft common law fraud section of opposition to motion to dismiss
1/12/2023	JBM	1	Review MTD and analysis of same
1/12/2023	JBM	1.5	Case law research regarding same
1/12/2023	JLH	1.3	Internet research for GBL section of MTD oppo
1/12/2023	JLH	1.4	Editing GBL draft section for MTD opposition, sending to EDR
1/12/2023	JLH	1.5	Negligent misrepresentation research
1/13/2023	EDR	2.2	Draft common law fraud section of opposition to motion to dismiss

Date	Atty	Time	Description
1/13/2023	EDR	1.6	Research negligent misrepresentation for opposition to motion to dismiss
1/13/2023	EDR	3.1	Draft negligent misrepresentation section of opposition to motion to dismiss
1/13/2023	EDR	1.3	Research unjust enrichment for opposition to motion to dismiss
1/13/2023	JLH	1.5	Case law research re negligent misrepresentation
1/13/2023	JLH	2.3	Case law research re NY Bottle Law
1/13/2023	JLH	3	Case law research re negligent misrepresentation
1/17/2023	EDR	11.7	Draft opposition to motion to dismiss
1/17/2023	EDR	1.8	Research breach of contract for opposition to motion to dismiss
1/17/2023	EDR	2.2	Draft breach of contract section of opposition to motion to dismiss
1/17/2023	EDR	0.8	Research breach of covenant for opposition to motion to dismiss
1/17/2023	EDR	1.7	Draft breach of covenant section of opposition to motion to dismiss
1/17/2023	EDR	3.4	Draft RICO section of opposition to motion to dismiss
1/17/2023	EDR	1.8	Draft common law fraud section of opposition to motion to dismiss
1/17/2023	JLH	0.9	Case law research re GBL 349 claim
1/17/2023	JLH	1.2	Drafting sections of MTD opposition brief
1/17/2023	JLH	2.2	Internet research on MBD
1/17/2023	JLH	2.4	Internet and case law research on bottle bill
1/18/2023	EDR	1.9	Research for opposition to motion to dismiss
1/18/2023	EDR	3.7	Draft opposition to motion to dismiss
1/18/2023	JBM	2.7	Redline and update MTD oppo in connection with same
1/18/2023	JBM	3.7	Review, edit, and legal research on MTD oppo re RICO plead as a pretext
1/18/2023	JLH	3.5	Drafting negligent misrepresentation section and adding to brief
1/18/2023	TP	0.2	Conference with JBM regarding responses to Defendants' discovery requests
1/19/2023	EDR	2.2	Research for opposition to motion to dismiss
1/19/2023	EDR	1.4	Draft CAFA section of opposition to motion to dismiss
1/19/2023	EDR	1.8	Research individual defendants for opposition to motion to dismiss
1/19/2023	EDR	2.9	Draft individual defendants section of opposition to motion to dismiss
1/19/2023	JBM	0.2	Office conference with EDR regarding same
1/19/2023	JBM	0.5	Review an analysis of defense claim that CAFA jurisdiction lacking
1/19/2023	JBM	0.5	Office conferences with EDR regarding same
1/19/2023	JBM	1	Review edits to brief and proofread
1/19/2023	JBM	1	Legal research on pleading alternative unjust enrichment claims
1/19/2023	JBM	1	Proof and edit brief before transmitting to SLW
1/19/2023	JBM	1.2	Perform legal research and analysis regarding same
1/19/2023	JBM	2	Follow up internet and legal research regarding RICO plead as pretext
1/19/2023	JBM	2	Review and edit GBL 349 consumer-oriented argument
1/19/2023	JBM	2.5	Revise and edit common law fraud and negligent misrepresentation brief sections
1/19/2023	JBM	4.5	Revise, edit, and research RICO injury argument and 9(b)

Date	Atty	Time	Description
1/20/2023	EDR	9.9	Generally revise opposition to motion to dismiss
1/20/2023	EDR	0.9	Finalize and insert tables into opposition of motion to dismiss
1/20/2023	EDR	0.3	Serve opposition to motion to dismiss
1/20/2023	JBM	1	Follow-up proofreading and edits to state law sections of brief
1/20/2023	JBM	1	Office conferences with EDR and JLH re workflow
1/20/2023	JBM	1	Legal research on portions of time barred claims and edit section regarding same
1/20/2023	JBM	1.5	Further research on pleading unjust enrichment in the alternative and research on alternative good faith and fair dealing claims
1/20/2023	JBM	1.5	Further proofreading of brief
1/20/2023	JBM	2	Research and edit breach of contract section of brief
1/20/2023	JBM	2	Evaluate SLW edits to intro and RICO sections of brief and proofread brief
1/20/2023	JBM	3.2	Research and edit bottle bill, breach of contract, and individual defendant sections of brief
1/20/2023	JLH	0.1	Confer w EDR and JBM re draft of MTD opposition
1/20/2023	JLH	0.1	Confer w EDR and JBM re draft of MTD opposition
1/20/2023	JLH	0.2	Confer w EDR and JBM re draft of MTD opposition
1/20/2023	JLH	0.2	Confer w EDR and JBM re draft of MTD opposition
1/20/2023	JLH	0.6	Editing MTD opposition brief
1/20/2023	JLH	1.5	Bluebooking MTD opposition brief
1/20/2023	JLH	2.2	Editing MTD opposition brief
1/20/2023	JLH	2.5	Bluebooking MTD opposition brief
1/20/2023	SLW	6.2	Editing Plaintiff's memorandum of law in opposition to defendants' motion to dismiss RICO, New York GBL fraud claims, and additional common law claims
1/20/2023	TP	2.4	Review opposition to MTD a
1/21/2023	SLW	0.1	Review [REDACTED] received from Natale Swatz/ Village Social
1/21/2023	SLW	1.1	Review/edit Declaration in support of Plaintiffs' memorandum of law in opposition to Defendants' motion to dismiss Second Amended Complaint, and final review of Memo before filing
1/23/2023	EDR	0.5	Rule 26(f) conference
1/23/2023	EDR	1.1	Prepare and send courtesy copies of opposition to motion to dismiss
1/23/2023	EDR	1.1	Prepare for Rule 26(f) conference
1/23/2023	JBM	0.5	Office conference with EDR re workflow on brief and Rule 26(f) conference
1/23/2023	JBM	0.5	Save documents to case file
1/23/2023	JBM	0.5	Attend Rule 26(f) conference
1/23/2023	JBM	0.5	Follow up research regarding same
1/23/2023	JBM	0.7	Review jumpstart outline in connection with same
1/23/2023	JBM	0.7	Office conferences with SLW and EDR in connection with same
1/23/2023	JBM	1	Review brief to check for errors
1/23/2023	JBM	1	Prepare for Rule 26(f) meet and confer

Date	Atty	Time	Description
1/23/2023	TP	1.2	Attention to MB comments to draft MOU and internal correspondence re same
1/24/2023	EDR	1.8	Review and analyze defendants' RFPs and interrogatories
1/24/2023	JBM	0.7	Telephone conference with SLW re discovery planning issues
1/24/2023	JBM	1.5	Review defendants' written discovery requests and legal research in connection with same
1/24/2023	SLW	1	Upon receipt of Defendants' first set of interrogatories and requests for production to plaintiffs from defense counsel Ripin, review and analysis thereof
1/25/2023	JBM	0.5	Review Rule 26(f) for proposed discovery plan
1/25/2023	JBM	0.7	Draft proposed discovery plan in connection with same
1/25/2023	JBM	1	Internet and legal research on clawback agreements
1/25/2023	JBM	1.7	Research and draft proposed discovery plan
1/26/2023	JBM	1.5	Further research and drafting of proposed discovery plan
1/28/2023	JBM	0.2	Telephone conference with TP to discuss strategy responding to Defendants' discovery demands
1/30/2023	JBM	0.2	Attention to email correspondence from opposing counsel
1/30/2023	JBM	0.5	Office conference with TP to discuss strategy responding to Defendants' discovery demands
1/30/2023	TP	0.5	Conference with JBM regarding responses to Defendants' discovery requests
1/31/2023	JBM	2.2	Legal research regarding contention interrogatories and boilerplate document responses
1/31/2023	JBM	3.2	Review and analyze TP draft of responses and objections to MB written discovery
1/31/2023	SLW	0.7	Upon receipt of Defendants' edits to Plaintiffs' proposed discovery plan, review and analysis thereof
2/1/2023	JBM	1.7	Review and edit Rule 26(f) report and internet research in connection with same
2/2/2023	JBM	0.2	Telephone conference with SLW regarding same
2/2/2023	JBM	0.7	Review and edit Rule 26(f) report
2/2/2023	JBM	1	Legal and internet research on rolling document productions and discovery start date
2/3/2023	JBM	0.5	Office conference with TP regarding same
2/3/2023	JBM	1	Attention to defense counsel edits to discovery plan
2/3/2023	TP	0.5	Conference with JBM re discovery plan edits
2/3/2023	TP	1.3	Attention to draft of 26(f) report and defense counsel edits to discovery plan in connection with same
2/6/2023	EDR	0.6	Review and analyze discovery plan and deadlines set forth therein
2/6/2023	JBM	0.2	Office conference with EDR regarding same
2/6/2023	JBM	0.2	Office conference with SLW regarding same
2/6/2023	JBM	0.5	Attention to Court additions to discovery plan and email correspondence with TP & EDR regarding same
2/6/2023	JBM	0.7	Attention to email from SLW regarding discovery plan review same
2/6/2023	JBM	0.7	Finalize and file proposed discovery plan

Date	Atty	Time	Description
2/6/2023	SLW	1.2	Review and edit of penultimate discovery production schedule stipulation, and circulating comments to team
2/6/2023	TP	0.6	Attention to finalized discovery plan and internal correspondence re same
2/7/2023	EDR	0.8	Revise ESI protocol
2/7/2023	JBM	0.2	Save documents to case file
2/7/2023	JBM	0.2	Call and email correspondence with A. Belenky re [REDACTED]
2/7/2023	JBM	0.2	Review and analysis of same
2/7/2023	JBM	0.2	Office conference with EDR re protective order and give assignment to edit same
2/7/2023	JBM	0.5	Review EDR edits to protective order and transmit same to opposing counsel
2/7/2023	JBM	0.5	Office conference with TP regarding ESI consultant
2/7/2023	JBM	1	Revise and edit defense counsel's draft protective order in connection with same
2/7/2023	JBM	2.2	Perform legal research [REDACTED]
2/7/2023	TP	0.5	Conference with JBM regarding ESI issues and expert
2/8/2023	JBM	0.2	Call with ESI consultant D. Forrest regarding updating ESI protocol
2/8/2023	JBM	0.2	Draft email correspondence to D. Forrest re ESI protocol
2/8/2023	JBM	1	Review and assemble documents in connection with ESI protocol drafting
2/8/2023	JBM	4.7	Draft ESI protocol and legal and internet research regarding same
2/9/2023	EDR	0.3	Conference with S. Wittels regarding discovery responses
2/9/2023	EDR	0.4	Review and analyze personnel at clients to discuss discovery requests with
2/9/2023	JBM	0.2	Call with D. Forrest re ESI protocol
2/9/2023	JBM	0.5	Email correspondence with D. Forrest re ESI protocol and review of protocol
2/9/2023	JBM	0.5	Call with SLW re planning [REDACTED]
2/9/2023	JBM	1	Attention to contract from ESI vendor and calls regarding same
2/9/2023	JBM	1	Draft checklist for client interviews in connection with same
2/9/2023	JBM	2.5	Revise and edit ESI protocol following same to inter alia incorporate keyword search methodology and respond to other guidance from D. Forrest
2/9/2023	JBM	4.2	Revise and edit draft document request and interrogatories and legal research on objections in connection with same
2/9/2023	SLW	3.1	Editing and circulating to team Plaintiffs' response to Manhattan Beer's first set of interrogatories and document demands
2/10/2023	EDR	0.3	Conference with S. Wittels regarding discovery responses
2/10/2023	EDR	0.5	Conference with Village Social regarding [REDACTED]
2/10/2023	EDR	0.6	Conference with Livanos Group regarding [REDACTED]
2/10/2023	JBM	2.2	Follow-up edits to responses to document requests [REDACTED]

Date	Atty	Time	Description
2/10/2023	JBM	4.2	Continued revisions and edits to responses to Defendants' document requests and follow up research and an analysis concerning same
2/10/2023	SLW	0.4	Review additional reports from [REDACTED]
2/10/2023	SLW	0.6	Conferring by phone with [REDACTED]
2/10/2023	SLW	0.7	Conferring by phone with owner [REDACTED]
2/13/2023	EDR	0.5	Interview with potential custodian regarding discoverable documents
2/13/2023	EDR	0.5	Interview with potential custodian regarding discoverable documents
2/13/2023	EDR	0.7	Review and revise checklist for interviews with potential custodians
2/13/2023	EDR	1.1	Review and revise responses to defendants' interrogatories
2/13/2023	EDR	1.1	Research for responses to defendants' document requests
2/13/2023	EDR	3.1	Review and revise responses to defendants' document requests
2/13/2023	JBM	0.2	Office conference with EDR and TP regarding [REDACTED]
2/13/2023	JBM	0.5	Office conference with EDR re RFP responses and telephone conference with SLW concerning same
2/13/2023	JBM	1.2	Legal and internet research on discrete subparts in counting interrogatory numbers
2/13/2023	JBM	1.5	Revise and edit interrogatory responses and review local rules regarding same
2/13/2023	JBM	2.2	Review and proof RFP responses and update outline for client interviews in connection with same
2/13/2023	TP	0.2	Conference with JBM regarding interrogatory responses
2/14/2023	EDR	0.8	Interview with potential custodian regarding discoverable documents
2/14/2023	JBM	0.5	Review, finalize and transmit protective order edits to defense counsel
2/14/2023	JBM	1	Review Defendants' edits to protective order and legal and internet research [REDACTED]
2/14/2023	JBM	1.7	Follow up legal research [REDACTED]
2/14/2023	SLW	0.3	Review protective order changes
2/14/2023	SLW	0.4	Review questions for clients [REDACTED]
2/14/2023	SLW	2.2	Meeting [REDACTED]

Date	Atty	Time	Description
2/14/2023	SLW	2.4	Meeting with Frank Bueti and Brandon Haug at Locali restaurant in Mt Kisco [REDACTED]
2/15/2023	EDR	0.6	Conference with S. Wittels regarding discovery responses
2/15/2023	EDR	0.8	Interview with potential custodian regarding discoverable documents
2/15/2023	JBM	0.2	Review opposing counsel's edits to protective order and email correspondence in connection with same
2/15/2023	JBM	0.5	Legal research regarding same
2/15/2023	JBM	0.5	Follow up review of opposing counsel's edits to protective order
2/15/2023	SLW	1.2	Conferring with manager of Modern barn [REDACTED]
2/15/2023	SLW	2.1	Meeting two managers at City Limits in White Plains [REDACTED]
2/16/2023	EDR	0.2	Download filings and put in case file
2/16/2023	SLW	0.3	Review defendants' edits to protective order
2/17/2023	EDR	0.9	Draft second set of document requests
2/17/2023	JBM	0.2	Attention to scheduling correspondence from opposing counsel and SLW
2/17/2023	JBM	0.2	Follow up email and office conference with EDR regarding same
2/17/2023	SLW	1.8	Further edits to Plaintiffs' response to defendants' discovery demands in light of updated information from clients and circulating to team
2/17/2023	TP	0.1	Attention to internal correspondence re defense counsel extension request
2/17/2023	TP	0.5	Attention to SLW edits to discovery responses and internal conference re same
2/21/2023	EDR	0.3	Finalize and file letter motion requesting extension of deadline to file ESI protocol
2/21/2023	JBM	0.2	Further review of case calendar and case file in connection with same
2/21/2023	JBM	0.5	Draft letter to court regarding extending deadline for submitting ESI protocol
2/21/2023	JBM	0.5	Email correspondence with opposing counsel regarding meet and confer and schedule and follow up office conference with EDR regarding same
2/21/2023	JBM	1.5	Review and analyze opposing counsel's edits to ESI protocol
2/21/2023	JBM	2.2	Internet and legal research on deduplication
2/21/2023	SLW	1.8	Communicating with Brandon Haug [REDACTED]
2/22/2023	EDR	0.2	Conference with S. Wittels regarding discovery responses

Date	Atty	Time	Description
2/22/2023	SLW	0.1	Upon receipt of court's order extending time to file ESI protocol, review thereof including admonition for parties to work more expeditiously
2/23/2023	EDR	0.3	Conference with S. Wittels regarding discovery responses
2/23/2023	EDR	0.4	File opposition to motion to dismiss
2/23/2023	EDR	1.2	Prepare and send courtesy copy of opposition to motion to dismiss to court
2/24/2023	EDR	0.7	Client interview regarding discoverable information
2/24/2023	EDR	0.9	Review and analyze Defendants' reply in support of motion to dismiss
2/24/2023	JBM	1.7	Review Court rules re discovery disputes and follow up review of competing ESI proposals in issues of search term validation and hit report contents and privilege issues
2/24/2023	JBM	4.2	Review and comparison of parties' competing ESI protocol proposals on issues of disclosure of preservation and collection methodologies and legal research regarding same
2/24/2023	TP	1.4	Review and analyze defendants' MTD reply
2/25/2023	SLW	1.5	Upon receipt of defendants' reply in support of 12b6 motion to dismiss Second Amended Complaint, review thereof
2/27/2023	EDR	3.9	Revise responses to Defendants' document requests
2/27/2023	EDR	3.3	Draft interrogatory responses
2/27/2023	EDR	0.9	Research for responses to interrogatories
2/27/2023	JBM	0.7	Draft email correspondence to D. Forrest regarding same
2/27/2023	JBM	2.5	Follow up legal research on [REDACTED]
2/27/2023	JBM	3.2	Further review and comparison of parties' competing ESI protocol proposals on metadata, email threading and deduplication and legal research regarding same
2/28/2023	EDR	1	Conference with S. Wittels and T. Palikovic regarding discovery responses
2/28/2023	EDR	1.8	Meet and confer regarding ESI protocol
2/28/2023	EDR	2.3	Revise responses to Defendants' interrogatories
2/28/2023	JBM	0.2	Office conferences with EDR regarding ESI protocol meet and confer
2/28/2023	JBM	0.2	Organize documents and case file following meet and confer
2/28/2023	JBM	0.5	Calls with D. Forrest re parties' competing ESI protocol proposals
2/28/2023	JBM	1.7	Attend and lead ESI meet and confer
2/28/2023	JBM	2.5	Review and analysis of competing ESI protocol proposals in preparation for meet and confer and draft outline of issues to raise in connection with same
2/28/2023	SLW	0.4	Conferring with EDR and TP regarding strategy for discovery responses
2/28/2023	SLW	0.7	Conferring with [REDACTED]
2/28/2023	TP	0.5	Attention to internal correspondence with SLW and EDR re discovery responses

Date	Atty	Time	Description
2/28/2023	TP	1	Conference with SLW and EDR regarding discovery responses
2/28/2023	TP	1.2	Reviewing Defendants' discovery requests and interrogatories and outlining positions
3/1/2023	EDR	3.8	Revise, finalize and serve responses to Defendants' interrogatories
3/1/2023	EDR	3.9	Revise, finalize and serve responses to Defendants' RFPs
3/1/2023	JBM	0.5	Follow up office conferences with EDR regarding RFP responses
3/1/2023	JBM	0.5	Legal and internet research on search platform disclosures in ESI protocols
3/1/2023	JBM	0.7	Draft outline of discussion topics for D. Forrest regarding same
3/1/2023	JBM	1	Review and edit EDR draft of interrogatory responses and office conferences with EDR regarding same
3/1/2023	JBM	1	Legal and internet research on hit reports and test the rest issues
3/1/2023	JBM	1.5	Review and edit EDR draft of RFP responses and office conferences with EDR regarding same
3/1/2023	JBM	2.2	Review notes from ESI meet and confer and edit ESI protocol in connection with same
3/1/2023	JBM	2.2	Follow up edits to ESI protocol, email to defense counsel, and comments on differences between the parties' ESI protocol proposals
3/1/2023	SLW	1	Conferring with Bill Livanos, Joe Bueti, and Connie P. [REDACTED]
3/1/2023	SLW	1.2	Assisting in finalizing Plaintiffs' discovery responses and interrogatory responses
3/1/2023	TP	2.5	Review draft responses to interrogatories
3/1/2023	TP	2.6	Attention to draft responses to defendants' RFPs
3/2/2023	EDR	2.3	Review and analyze defendants' responses to discovery requests
3/2/2023	JBM	0.2	Office conference with EDR re scheduling meet and confer
3/2/2023	JBM	0.2	Draft outline of issues and office conference with EDR regarding same
3/2/2023	JBM	0.7	Telephone conference with D. Forrest re ESI protocol issues
3/2/2023	JBM	1.2	Draft meet and confer summary email to opposing counsel and analyze meet and confer notes in connection with same
3/2/2023	JBM	2.5	Review and analyze Defendants' response to Plaintiffs' written discovery
3/2/2023	JBM	3.2	Review and edit ESI protocol
3/2/2023	SLW	0.3	As well as prepare for meet and confer on outstanding discovery with defendants
3/2/2023	SLW	1.7	Conferring with EDR regarding finalizing Plaintiffs' interrogatory responses, and review Defendants' deficiencies
3/2/2023	TP	1.4	Analysis of defendants' discovery deficiencies
3/3/2023	EDR	0.3	Draft second set of document requests
3/3/2023	EDR	1.7	Conference with B. McInturff regarding Defendants' discovery responses
3/3/2023	EDR	2.1	Review and analyze Defendants' discovery responses
3/3/2023	JBM	0.5	Office conference with EDR regarding global deficiencies in Defendants' responses to Plaintiffs' written discovery requests

Date	Atty	Time	Description
3/3/2023	JBM	1	Review discovery plan order, local rules, and Plaintiff's document requests in analysis of defense responses to Pls' written discovery
3/3/2023	JBM	1.5	Follow up legal research regarding same
3/3/2023	JBM	1.5	Attention to email correspondence from D. Forrest re [REDACTED]
3/3/2023	JBM	2	Follow up office conference with EDR regarding specific deficiencies in RFPs and Interrogatories
3/4/2023	JBM	0.2	Call with opposing counsel re Section III of Scheduling Order
3/4/2023	JBM	1	Follow up legal research in connection with same
3/4/2023	JBM	1.2	Draft letter to court re issues with Section III of Scheduling Order and review documents and call to EDR in connection with same
3/4/2023	JBM	2.2	Prepare for written discovery meet and confer and review and edit outline of deficiencies in Defendants' written discovery responses in connection with the same
3/4/2023	JBM	2.5	Attend and lead meet and confer
3/6/2023	EDR	0.3	Revise letter requesting extension of discovery dispute deadline
3/6/2023	EDR	0.7	Prepare for meet and confer
3/6/2023	EDR	2.5	Meet and confer regarding discovery responses
3/6/2023	EDR	2.8	Draft email confirming positions from meet and confer
3/6/2023	SLW	1.3	Participating with defense counsel on meet and confer concerning ESI and discovery objections, review joint letter to court requesting clarification on burden for moving if party objects to discovery, as well as request for additional time to submit any disputes on discovery
3/7/2023	EDR	0.5	Revise confirmatory email regarding discovery meet and confer
3/7/2023	JBM	0.2	Office conference with EDR regarding edits
3/7/2023	JBM	0.7	Review EDR proof to meet and confer email and format and transmit same to opposing counsel
3/7/2023	JBM	2	Revise and edit EDR draft of post-meet and confer email and review documents in connection with same
3/7/2023	SLW	0.3	Upon receipt of Court's order confirming that party objecting to discovery has the burden to move, and extending discovery dispute deadline, review and analysis thereof
3/9/2023	EDR	0.4	Revise email to defense counsel regarding plaintiffs' discovery responses
3/9/2023	JBM	0.2	Read and analyze Defendants' Rule 68 Offers of Judgment
3/9/2023	JBM	0.2	Telephone conference with SLW regarding same
3/9/2023	JBM	0.5	Office and telephone conferences with SLW and EDR regarding same
3/9/2023	JBM	0.7	Review EDR edits to MB email re meet and confer and finalize and transmit same
3/9/2023	JBM	2	Review and respond to MB email re meet and confer and legal research and analysis in connection with same
3/9/2023	JBM	3.7	Legal research into [REDACTED]

Date	Atty	Time	Description
3/9/2023	SLW	0.1	Confer with JBM regarding [REDACTED]
3/9/2023	SLW	2.7	Upon receipt of Defendants' Rule 68 offers of judgment, review and analysis thereof, and [REDACTED]
3/10/2023	EDR	0.4	Draft chart of [REDACTED]
3/10/2023	EDR	1.6	Revise, finalize, and serve second RFPs and interrogatories
3/10/2023	JBM	0.2	Email correspondence to opposing counsel re discovery responses and office conference with EDR in connection with same
3/10/2023	JBM	0.5	Office conference with EDR regarding [REDACTED]
3/10/2023	JBM	0.7	Further review and edits to document requests and interrogatories
3/10/2023	JBM	1.2	Further edits to ESI protocol and legal and internet research on privilege log issues
3/10/2023	JBM	1.5	Follow up legal research on email threading and deduplication and edits to ESI protocol concerning same
3/10/2023	JBM	2	Review and respond to MB edits to draft ESI protocol and legal and internet research on collection and processing of ESI
3/10/2023	JBM	2.2	Research and draft follow-up document and interrogatory requests stemming from counsel's revelation that challenged practices go back more than 15 years
3/10/2023	JBM	2.7	Call with D. Forrest regarding ESI issues and follow up edits to ESI protocol and email to D. Forrest re outstanding issues
3/11/2023	SLW	0.4	Review Defendants' admission as to longstanding practice to charge .10 cent for cardboard and various other discovery dispute issues in email from Peter R
3/13/2023	EDR	0.6	Meet and confer regarding discovery responses
3/13/2023	EDR	0.7	Draft and revise email regarding discovery meet and confer
3/13/2023	JBM	0.5	Attend and lead meet and confer
3/13/2023	JBM	0.7	Review EDR edits to post-conference email and update and transmit same
3/13/2023	JBM	1	Further preparation for meet and confer
3/13/2023	JBM	1.5	Review documents and perform case law research regarding same
3/13/2023	JBM	2	Draft comprehensive email summarizing agreements reached at meet and confer and review documents in connection with same
3/13/2023	JBM	3	Review and analysis of Defendants' response to Plaintiffs' summary of meet and confer issues from March 6 meet and confer and draft outline for 3/13 meet and confer
3/13/2023	SLW	0.6	Prepare for and participate on meet and confer with defense counsel on discovery disputes over inter alia invoices
3/14/2023	JBM	0.7	Office conference with TP regarding potential search terms
3/14/2023	TP	0.6	Review correspondence and meet and confer notes regarding search terms
3/14/2023	TP	0.7	Call with JBM regarding discovery issues and search terms
3/15/2023	EDR	0.4	Draft template for Rule 7.1 statements

Date	Atty	Time	Description
3/15/2023	JBM	0.2	Office conference and email correspondence with SLW regarding same
3/15/2023	JBM	0.5	Assemble documents and organize case file regarding same
3/15/2023	JBM	0.5	Email correspondence with SLW and EDR re Defendants' proposal re Plaintiffs' invoices
3/15/2023	JBM	0.5	Attention to SLW emails re client responses to updated interrogatories and office conference with EDR regarding same
3/15/2023	JBM	0.7	Call and email correspondence with D. Forrest re ESI protocol
3/15/2023	JBM	1.7	Review D. Forrest comments re ESI protocol and update ESI protocol edits and comments in connection with same
3/15/2023	JBM	1.7	Perform case law research on validation of search terms
3/15/2023	JBM	2.5	Review email correspondence with defense counsel re negotiated discovery responses and update Plaintiffs' document requests and interrogatories in connection with same
3/15/2023	JBM	2.5	Further revisions to ESI protocol and transmit same to Defendants
3/15/2023	SLW	0.3	Conferring with [REDACTED]
3/15/2023	SLW	0.6	Communicating with [REDACTED]
3/15/2023	SLW	1.3	Review and edit of proposed amended interrogatory responses and discovery responses by Livanos group
3/15/2023	TP	0.3	Review D. Forrest edits and comments to ESI protocol
3/15/2023	TP	0.8	Review status of ESI negotiations and parties' competing proposals
3/15/2023	TP	1.8	Research re search term validation and testing standards
3/16/2023	EDR	0.8	Finalize and send amended interrogatory responses to clients
3/16/2023	JBM	0.5	Telephone conference with SLW re Rule 68 offers of judgment and Defendants' responses to Pls.' Interrogatories and potential supplemented complaint
3/16/2023	JBM	0.7	Draft email correspondence to opposing counsel regarding plaintiffs' invoices and review case file regarding same
3/16/2023	SLW	0.1	, and conferring with JBM regarding strategy
3/16/2023	SLW	0.6	Conferring with [REDACTED]
3/16/2023	SLW	1	Communicating with [REDACTED]
3/16/2023	SLW	1.3	Editing amended plaintiffs' 7.1 responses [REDACTED] as well as amended discovery responses
3/17/2023	JBM	0.7	Attention to email from opposing counsel re scope of discovery and draft response to same
3/17/2023	JBM	0.7	Research and draft RFP letter sections on internal and external dissent regarding deposit practices
3/17/2023	JBM	1	Research and draft RFP letter sections on date range of discovery
3/17/2023	JBM	1.2	Draft background section of letter to Court regarding discovery disputes arising from Plaintiffs' document demands

Date	Atty	Time	Description
3/17/2023	JBM	1.5	Research and draft RFP letter on database data and ESI source disclosures
3/17/2023	JBM	1.7	Review meet and confer notes and discovery-related correspondence with opposing counsel and outline discovery disputes arising from Plaintiffs' interrogatories and document demands
3/17/2023	SLW	0.1	Review [REDACTED]
3/19/2023	JBM	1	Perform legal research on [REDACTED] and update Interrogatories letter in connection with same
3/19/2023	JBM	1	Research and drafting of Interrogatories letter re improper counting of interrogatories
3/19/2023	JBM	1.2	Revise and edit letter setting forth discovery disputes arising from Plaintiffs' document demands
3/19/2023	JBM	4.5	Further drafting of letter on interrogatory responses including sections on ESI source transparency, identity of individuals with knowledge of IT systems, and aggregate class-wide data
3/19/2023	SLW	1	Editing discovery motion to Court regarding defendants' failure to produce documents inter alia pre-dating 2016 concerning implementation of hidden bottle deposit charge
3/20/2023	EDR	0.8	Draft Rule 7.1 statements for Plaintiffs
3/20/2023	EDR	1	Revise, finalize and file letter motion regarding Defendants' discovery deficiencies responding to interrogatories
3/20/2023	EDR	1.1	Revise, finalize and file letter motion regarding Defendants' discovery deficiencies responding to RFPs
3/20/2023	EDR	1.2	Draft letter motion requesting leave to file supplemental complaint
3/20/2023	JBM	0.2	Review Judge Siebel individual practice rules in connection with same
3/20/2023	JBM	0.5	Follow up edits to RFP letter and office conference with JLH regarding both letters
3/20/2023	JBM	0.5	Meet and confer with opposing counsel re date range restrictions on discovery responses and Plaintiffs' invoices
3/20/2023	JBM	0.5	Review JLH edits to Interrogatory letter and revise and update same
3/20/2023	JBM	0.5	Office conference with EDR re supplemental complaint and review documents in connection with same
3/20/2023	JBM	0.7	Review SLW edits to RFP letter and revise and update same
3/20/2023	JBM	0.7	Review EDR edits to RFP letter and cross check exhibit references
3/20/2023	JBM	0.7	Review JLH edits to RFP letter motion and revise and update same
3/20/2023	JBM	0.7	Follow up office conference with EDR in connection with same and update RFP letter to court regarding same
3/20/2023	JBM	1.7	Finalize research and drafting of Interrogatories letter regarding transparency in ESI source disclosures
3/20/2023	JLH	0.1	Call w JBM re editing discovery dispute letters
3/20/2023	JLH	0.6	Editing Interrogatory dispute letter
3/20/2023	JLH	1	Editing RFP dispute letter
3/20/2023	TP	0.2	Reviewing Pls' Motion to compel first set of Interrogatories (ECF 54)

Date	Atty	Time	Description
3/20/2023	TP	0.3	Reviewing Pls' Motion to compel first set of RFPs (ECF 53)
3/20/2023	TP	0.3	Attention to Defendants' motion to compel (ECF 55)
3/21/2023	EDR	0.9	Draft letter motion requesting leave to file supplemental complaint
3/21/2023	JBM	0.2	Email correspondence with opposing counsel re ESI protocol and office conference with EDR regarding same
3/21/2023	JBM	0.2	Attention to letter seeking leave to supplement compliant
3/22/2023	SLW	0.9	Upon receipt of Judge Seibel's order referring case to Magistrate Judge Andrew Krause for discovery proceedings, review and analysis thereof, including research re new Magistrate
3/23/2023	EDR	2.4	Meet and confer regarding ESI protocol
3/23/2023	JBM	0.2	Follow up debrief with EDR regarding meet and confer
3/23/2023	JBM	1	Prepare for ESI protocol meet and confer and review documents in connection with same
3/23/2023	JBM	1	Review prior meet and confer notes and draft email to defense counsel memorializing and expanding upon proposal for forgoing production of invoices
3/23/2023	JBM	2	Attend and lead Plaintiffs' side of meet and confer
3/23/2023	SLW	0.6	Consider Defendants' proposal re dispute on invoices, and conferring with JBM regarding strategy on disputed discovery items, including whether to stipulate to defendants' proposal concerning limited production of invoices
3/24/2023	SLW	0.3	Review court order from Judge Krause setting shortened meet and confer timetable on discovery disputes and fixing 4-24-23 conference on various discovery disputes
3/24/2023	SLW	0.9	Review and analysis of Defendants' letter motion to J Krause regarding multiple discovery disputes
3/27/2023	EDR	0.3	Finalize and file letter regarding Defendants' motion to compel
3/27/2023	JBM	0.2	Email correspondence with opposing counsel re invoice discovery stipulation
3/27/2023	JBM	0.5	Call with D. Forrest regarding [REDACTED]
3/27/2023	JBM	0.7	Follow up internet and legal research in connection with same
3/27/2023	JBM	0.7	Draft email correspondence with opposing counsel regarding same
3/27/2023	JBM	0.7	Review J. Krause order on discovery disputes and email correspondence with EDR regarding same
3/27/2023	JBM	1.2	Review notes from 3/23 meet and confer and ESI protocol and prepare outline for call with ESI vendor
3/27/2023	TP	0.2	Attention to Defendants' response to 3/20 letter motion to compel (ECF 63)
3/27/2023	TP	0.3	Attention to Defendants' response to 3/20 letter motion to compel (ECF 62)
3/28/2023	EDR	0.3	Review and analyze Defendants' letters regarding discovery disputes
3/28/2023	JBM	0.7	Review recent GBL 349 case law and review local rules regarding notice of supplemental authorities

Date	Atty	Time	Description
3/28/2023	SLW	0.3	Review emails from defense counsel Peter Ripin agreeing to discovery production procedures
3/29/2023	EDR	0.2	Call with defense counsel regarding discovery issues
3/29/2023	EDR	0.2	Correspondence with defense counsel regarding discovery issues
3/29/2023	JBM	0.5	Review of Peter Ripin email re extension of time to produce hard copy documents and review of disclosure of individuals with knowledge of MB's deposit practices
3/30/2023	SLW	0.1	Review Judge Krause docket order extending time for parties to commence document production
3/30/2023	SLW	0.1	Upon receipt of email re discovery from Peter R and disclosure that four additional MB employees have knowledge of deposit practices, review and consideration of implications
4/3/2023	EDR	0.3	Correspondence regarding responses to Plaintiffs' second discovery requests
4/4/2023	JBM	1.2	Review notes from 3/23 meet and confer regarding same and call to D. Forest regarding deduplication and harvesting of hyperlinked attachments
4/4/2023	JBM	2.2	Read and analyze [REDACTED]
4/4/2023	JBM	3.2	Review defense counsel edits to ESI protocol and update and respond to same
4/4/2023	SLW	0.1	Consider defense request for additional time to respond to plaintiffs' second interrogatories and document request
4/6/2023	JBM	0.2	Office conference with EDR re supplemental pleading
4/7/2023	EDR	0.2	Conference with S. Wittels regarding supplemental pleading
4/8/2023	JBM	0.5	Draft comprehensive email correspondence to [REDACTED]
4/11/2023	JBM	0.2	Email to opposing counsel re meeting with ESI consultants and review of court rules regarding same
4/13/2023	TP	0.3	Attention to Defendants' Responses to 2nd interrogatories
4/17/2023	EDR	0.3	Draft and file letter requesting ESI Protocol extension
4/17/2023	EDR	0.5	Meet and confer regarding ESI Protocol
4/17/2023	EDR	0.9	Revise letter regarding supplemental pleading
4/18/2023	EDR	1.2	Meet and confer regarding ESI Protocol
4/18/2023	EDR	3.5	Draft letter and exhibits regarding supplemental pleading
4/18/2023	SLW	0.1	Review Judge Krause order extending time to submit ESI protocol
4/18/2023	SLW	0.2	Participate at meet and confer w- defense counsel re ESI
4/19/2023	EDR	0.3	Conference with S. Wittels regarding supplemental pleading
4/19/2023	EDR	1.3	Revise supplemental pleading
4/19/2023	EDR	1.5	Revise letter regarding supplemental pleading
4/20/2023	EDR	0.9	Revise, finalize, and file Rule 7.1 statements
4/20/2023	EDR	2	Revise, finalize, and file pre-motion letter requesting leave to file supplement to SAC
4/20/2023	TP	0.4	Reviewing Pls' pre motion conference letter re leave to file SAC
4/21/2023	EDR	0.6	Meet and confer regarding ESI Protocol
4/21/2023	JBM	0.5	Lead ESI protocol meet and confer

Date	Atty	Time	Description
4/21/2023	JBM	0.5	Follow up review of ESI protocol and call with D. Forrest regarding same
4/21/2023	JBM	1.5	Prepare for meet and confer and review ESI protocol edits and related documents in connection with same
4/21/2023	TP	0.4	Attention to Defendants' responses to Pls' Second RFPs
4/24/2023	EDR	0.2	Conference with B. McInturff regarding rulings at conference
4/24/2023	EDR	1.5	Court conference regarding discovery disputes
4/24/2023	EDR	3.3	Travel to and from court conference regarding discovery disputes
4/24/2023	EDR	1	Draft revised interrogatory responses
4/24/2023	SLW	1.9	Prepare for appearance before Magistrate Judge Krause
4/25/2023	EDR	0.3	Draft revised interrogatory responses and send to client for signature
4/25/2023	EDR	0.4	Revise email regarding discovery proposals
4/25/2023	JBM	1	Review EDR edits to email to opposing counsel following 4/24/23 hearing and review documents in connection with same
4/25/2023	JBM	1.5	Follow up legal research on hyperlinked documents as attachments and review ESI protocol in connection with same
4/25/2023	SLW	0.4	Researched 24-case bottle issues vis-a-vis application of 10c deposit
4/25/2023	SLW	1.3	Appear before Magistrate Judge Krause regarding various discovery disputes
4/27/2023	EDR	0.4	Prepare for meet and confer regarding discovery responses
4/27/2023	EDR	1.6	Meet and confer regarding discovery responses
4/28/2023	EDR	0.2	Correspondence with defense counsel regarding meet and confer
4/28/2023	EDR	1	Review and analyze transcript from 4.23.23 hearing
5/1/2023	EDR	0.5	Revise email regarding meet and confer
5/1/2023	EDR	1	Discovery meet and confer
5/1/2023	EDR	1.7	Draft responses to defendants' second discovery requests
5/1/2023	SLW	0.2	Confer with [REDACTED]
5/1/2023	SLW	0.9	Edit tailored discovery demands regarding 10c deposits
5/1/2023	SLW	0.8	Prepare for and participate at meet and confer w- defense counsel regarding outstanding demands regarding 10C data, and additional discovery needed
5/2/2023	EDR	0.2	Call with defense counsel regarding document production technical issue
5/2/2023	EDR	0.2	Correspondence with defense counsel regarding document production technical issue
5/2/2023	EDR	0.2	Draft responses to defendants' second discovery requests
5/2/2023	TP	0.2	Attention to Defendants' opposition to request for sur-reply and cases cited therein
5/2/2023	TP	0.4	Attention to Defendants' response to pls' pre motion letter for leave to file SAC
5/3/2023	EDR	0.7	Meet and confer regarding discovery disputes
5/3/2023	EDR	1.4	Draft email following up on meet and confer regarding discovery disputes
5/4/2023	EDR	1.7	Draft and serve third requests for production

Date	Atty	Time	Description
5/4/2023	EDR	2.2	Research for letter regarding discovery disputes
5/4/2023	EDR	3.1	Revise, finalize, and file letter regarding discovery disputes with exhibits
5/5/2023	EDR	0.3	Revise email to defense counsel regarding discovery meet and confer
5/5/2023	EDR	1.4	Prepare and send courtesy copies of Plaintiffs' discovery disputes letter to Court
5/8/2023	EDR	1.8	Meet and confer with defense counsel regarding various discovery items
5/8/2023	EDR	3.4	Review and produce documents
5/8/2023	SLW	0.6	Review and edit supplemental letter to Judge Krause regarding ongoing disputes concerning production of data and timeframe
5/8/2023	SLW	0.9	Review defendants' proposed mediation proposal after meet and confer
5/9/2023	EDR	0.6	Revise and send email to defense counsel regarding meet and confer
5/9/2023	EDR	0.8	Review and analyze document production
5/9/2023	SLW	0.6	Upon receipt of defense counsel Eric Przybylko email regarding ESI, consultants, and production of plaintiffs' ESI, review thereof and discussing with team as to need to produce data with meta-data load Files, text files, etc.
5/9/2023	SLW	0.7	Drafting and editing Plaintiffs' proposed counter mediation proposal
5/10/2023	EDR	0.7	Prepare documents for production
5/10/2023	SLW	2.2	Prepare for an appear before Magistrate Judge Krause regarding discovery disputes, including particular time frame at issue and scope of responses
5/11/2023	EDR	0.9	Coordinate document production with vendor
5/11/2023	SLW	1.5	Drafting and editing [REDACTED]
5/12/2023	EDR	0.8	Coordinate document production with vendor and send to defendants
5/12/2023	EDR	1.2	Revise, finalize, and file letter regarding defendants' interrogatory responses
5/12/2023	SLW	1.3	Editing sur-reply to Judge Seibel requesting permission to file short response describing why defendants' "revised" interrogatory responses claiming that five additional Manhattan beer personnel are also knowledgeable about \$.10 deposit fee is misleading
5/15/2023	EDR	2.7	Review and analyze defendants' production
5/16/2023	EDR	0.3	Call with client regarding [REDACTED]
5/16/2023	EDR	0.4	Draft email to client regarding [REDACTED]
5/16/2023	EDR	0.8	Revise responses to first interrogatories
5/16/2023	EDR	2.4	Investigation of clients' sources of documents
5/16/2023	SLW	1.2	Conferring with both [REDACTED]

Date	Atty	Time	Description
5/17/2023	EDR	0.2	Coordinate uploading Defendants' production into database
5/17/2023	EDR	0.2	Correspondence with defense counsel regarding ESI protocol
5/17/2023	EDR	0.4	Revise email to defense counsel regarding discovery disputes
5/17/2023	EDR	0.6	Calls with contacts regarding case
5/17/2023	EDR	0.7	Finalize and serve amended responses to first discovery requests
5/17/2023	EDR	0.7	Revise ESI protocol to add data sources
5/17/2023	SLW	0.6	Review plaintiffs' position and defendants' responses regarding ESI dispute and follow up ESI questions regarding agreements to produce certain data
5/18/2023	EDR	0.2	Revise email regarding RFP response deficiencies
5/19/2023	JBM	1	Perform legal research on [REDACTED]
5/19/2023	SLW	0.4	Edit letter to court re ESI and related issues
5/22/2023	EDR	1.5	Meet and confer with defense counsel
5/22/2023	EDR	2	Draft email regarding meet and confer with defense counsel
5/22/2023	JBM	0.2	Email correspondence to opposing counsel re whether challenged conduct has been paused
5/22/2023	JBM	0.2	Office conference with EDR re next steps
5/22/2023	JBM	0.5	Further prep for meet and confer
5/22/2023	JBM	0.7	Revise and edit post meet and confer confirmatory email
5/22/2023	JBM	1	Review and annotate May 10 hearing transcript
5/22/2023	JBM	1	Attend and lead meet and confer
5/22/2023	JBM	1.5	Review May 17 and 18 emails to defense counsel to prepare for meet and confer and update sample invoice for database discovery in connection with same
5/22/2023	JBM	1.5	Further research and review of Petane case and related filings
5/22/2023	JBM	1.5	Draft database discovery letter
5/22/2023	JBM	2.5	Follow up drafting of database letter and additional research regarding same
5/22/2023	SLW	0.4	Prepare for meet and confer with Defendants' counsel regarding outstanding discovery disputes regarding ESI and various discovery disputes
5/23/2023	EDR	0.2	Conference with B. McInturff regarding discovery dispute letter
5/23/2023	JBM	0.2	Office conference with EDR regarding same
5/23/2023	JBM	1.5	Revise and edit database letter
5/23/2023	SLW	0.6	Participate at meet and confer with defense counsel, Eric P, Peter R and team regarding various disputes, including potential pause of deposit fee, managerial employees, and fields for data production
5/24/2023	EDR	0.2	Correspondence regarding discovery requests
5/24/2023	JBM	0.2	Review defense counsel's email regarding ECF No. 93 and revise proposed letter to court in connection with same
5/24/2023	JBM	0.7	Review email correspondence and docket entries regarding same
5/25/2023	EDR	2.7	Revise letter regarding database data dispute
5/25/2023	EDR	4.1	Research caselaw for letter regarding database data dispute
5/25/2023	JBM	0.2	Email correspondence with M. Amber re ESI services agreement

Date	Atty	Time	Description
5/26/2023	EDR	0.4	Draft, finalize, and file letter requesting extension to meet and confer regarding discovery responses
5/26/2023	EDR	0.5	Finalize and file letter regarding database data dispute
5/26/2023	JBM	1.2	Perform additional legal research on proportionality
5/26/2023	JBM	2	Revise and edit database letter
5/26/2023	JLH	0.3	Review and edit letter brief re data production time period
5/26/2023	SLW	0.1	Upon receipt of email from defense counsel Eric Przybylko, review thereof and agreement that Defendants will use the identified relevant managerial employees for custodial ESI collection
5/27/2023	SLW	0.1	Upon receipt of Judge Krause order adjourning conference and directing parties to submit discovery disputes by 6-9-23, review thereof
5/30/2023	EDR	0.4	Correspondence with defense counsel regarding disclosures made pursuant to ESI Protocol
5/30/2023	EDR	1.4	Revise responses to defendants' second discovery requests
5/30/2023	JBM	0.2	Review EDR edits to email responding to defense counsel's 5/24 email
5/30/2023	JBM	0.5	Call and email correspondence with D. Forrest re ESI protocol disclosures
5/30/2023	JBM	0.5	Office conference with ERD regarding ESI disclosures and follow up email to D. Forrest regarding same
5/30/2023	JBM	0.7	Review 5/24 email from opposing counsel re discovery matters and draft response to same
5/30/2023	JBM	0.7	Review case file and email correspondence in connection with same
5/30/2023	JBM	1	Review court transcripts from April and May conferences in connection with same
5/30/2023	JBM	1.5	Review Defendants' responses to third RFPs and draft outline of meet and confer regarding same
5/31/2023	EDR	0.2	Conference with B. McInturff regarding document collection
5/31/2023	EDR	0.3	Call with ILS regarding document collection
5/31/2023	EDR	2.3	Review and analyze defendants' document production
5/31/2023	JBM	0.2	Office conference with EDR regarding categories of database data that are not reflected on invoices
5/31/2023	JBM	0.7	Review case file and email correspondence in connection with same
5/31/2023	JBM	0.7	Review ESI protocol and office conferences with EDR regarding same
5/31/2023	JBM	0.7	Finalize email to opposing counsel and meet and confer outline
5/31/2023	JBM	1	Update meet and confer outline regarding same
5/31/2023	JBM	2.2	Further review of Defendants' responses to third RFPs and analysis of same
6/1/2023	EDR	0.5	Review and analyze defendants' document production
6/1/2023	JBM	0.2	Organize case file
6/2/2023	EDR	1.3	Review and analyze defendants' document production
6/2/2023	EDR	1.4	Draft email following up on meet and confer
6/2/2023	EDR	2.1	Meet and confer regarding discovery responses
6/2/2023	EDR	2.2	Finalize and serve responses to defendants' second discovery requests

Date	Atty	Time	Description
6/2/2023	JBM	0.2	Office conference with EDR regarding same
6/2/2023	JBM	2	Further edits to meet and confer outline regarding Defendants' responses to third RFPs
6/2/2023	JBM	2	Review EDR notes to meet and confer and edit EDR draft email regarding same
6/2/2023	JBM	2.5	Further preparation for and attend meet and confer
6/2/2023	SLW	0.4	Review [REDACTED]
6/2/2023	SLW	0.8	Upon receipt of defendants' third request for production of documents to plaintiffs, review thereof
6/5/2023	EDR	1.1	Review and analyze document production
6/5/2023	EDR	2.1	Draft response to defense counsel's email regarding production deficiencies
6/5/2023	JBM	0.7	Review of [REDACTED]
6/6/2023	EDR	1.1	Review and analyze document production
6/6/2023	JBM	0.2	Office conference with EDR to discuss case tasks
6/6/2023	JBM	1	Review case file and email correspondence and email opposing counsel re data discovery
6/7/2023	EDR	0.5	Conference with Steve Wittels regarding document collection
6/7/2023	EDR	1.2	Revise and send email to defense counsel regarding production deficiencies
6/7/2023	EDR	2.6	Draft responses to 3rd requests for production
6/7/2023	EDR	4.1	Review and analyze defendants' document production
6/7/2023	JBM	0.5	Office conferences with EDR in connection with same
6/7/2023	JBM	0.7	Email correspondence with opposing counsel re meet and confer and Defendants' production of sample data and review prior correspondence in connection with same
6/7/2023	JBM	1.5	Revise and edit EDR email to opposing counsel re plaintiffs' discovery efforts
6/8/2023	EDR	1.1	Prepare exhibit for letter regarding discovery disputes
6/8/2023	EDR	1.5	Meet and confer regarding production deficiencies
6/8/2023	EDR	2.5	Calls regarding document collection
6/8/2023	JBM	0.2	Revise and edit task
6/8/2023	JBM	0.7	Office and telephone conferences with SLW and EDR in connection with same
6/8/2023	JBM	0.7	Further drafting of pre-conference letter
6/8/2023	JBM	1	Outline and draft pre-conference letter
6/8/2023	JBM	1	Review transcript of May 10 conference and drafting of pre-conference letter regarding same
6/8/2023	JBM	1.2	Revise and edit pre-conference letter
6/8/2023	JBM	1.5	Review EDR draft of RFP comparison chart and cross check answers to written document requests
6/8/2023	JBM	1.7	Review of email correspondence with opposing counsel and notes of June 2 meet and confer and update pre-conference letter in connection with same

Date	Atty	Time	Description
6/8/2023	JBM	2	Review May 4 pre-conference filing in connection with same and exhibits and related emails
6/8/2023	JBM	2	Prepare for and attend meet and confer
6/8/2023	SLW	0.1	Communicating by email with [REDACTED]
6/8/2023	SLW	0.4	Participate at meet and confer with defense counsel regarding inter alia parties' document collection and production to date
6/9/2023	EDR	2.2	Calls regarding document collection
6/9/2023	EDR	3.9	Revise letter regarding discovery disputes
6/9/2023	JBM	0.5	Update pre-conference letter in connection with same
6/9/2023	JBM	0.5	Review EDR edits to letter
6/9/2023	JBM	0.7	Finalize and file same
6/9/2023	JBM	1	Office conference with JLH re pre-conference letter and review JLH edits to letter in connection with same
6/9/2023	JBM	1	Final proofing of letter and exhibit
6/9/2023	JBM	1.5	Further revise and edits pre-conference letter and email correspondence with EDR regarding same
6/9/2023	JBM	2.5	Perform legal research on discovery objections where no items are withheld
6/9/2023	JLH	0.6	Reviewing and editing discovery dispute letter re RFPs
6/9/2023	TP	0.5	Reviewing dispute letter re RFPs
6/12/2023	EDR	2.3	Calls with client and ILS regarding document collection
6/12/2023	JBM	0.2	Call to ILS consultant D. Forrest regarding same
6/12/2023	JBM	0.7	Office conferences with EDR and SLW regarding ESI collection matters
6/12/2023	JBM	1.7	Perform legal research regarding same
6/12/2023	SLW	2.9	Conferring and meeting with [REDACTED]
6/13/2023	EDR	0.2	Analyze client email
6/13/2023	EDR	0.3	Correspondence with ILS regarding document collection
6/13/2023	EDR	1.1	Draft email to defense counsel regarding meet and confer
6/13/2023	EDR	1.1	Calls with clients regarding [REDACTED]
6/13/2023	JBM	0.5	Telephone conference with EDR and SLW regarding same
6/13/2023	JBM	0.5	Email and office conferences with EDR regarding collection timing
6/13/2023	JBM	0.7	Further research on ESI protocol amendments
6/13/2023	JBM	0.7	Attention to email correspondence regarding analysis of documents for potential responsiveness
6/13/2023	JBM	2	Legal and internet research on moving to amend ESI protocol
6/14/2023	EDR	5.6	Calls with clients [REDACTED]
6/14/2023	JBM	0.5	Office conferences with EDR and JLH regarding [REDACTED]
6/14/2023	JBM	0.7	Call to J. Long in connection with same
6/14/2023	JBM	1.7	Review of ESI protocol and internet research in connection with same

Date	Atty	Time	Description
6/14/2023	JBM	2	Edit EDR proposed response to opposing counsel's June 8 post meet and confer email and review documents and prior correspondence in connection with same
6/14/2023	JLH	0.3	Further review of ESI protocol re search and collection provisions; related correspondence w EDR
6/14/2023	JLH	0.5	Confer w JBM and EDR re [REDACTED]
6/14/2023	SLW	1.1	Upon receipt from Eric P of defendants' fourth set of document demands and third set of interrogatories, review thereof
6/15/2023	EDR	2	Draft responses to defendants' third requests for production
6/15/2023	EDR	5.4	Calls with clients and vendor regarding [REDACTED]
6/15/2023	JBM	1	Assemble documents in connection with same
6/15/2023	JBM	1	Further review and analysis of Petane v. Nestle Waters case
6/15/2023	JBM	3.7	Review all filings and prior correspondence in preparation for June 16 discovery hearing
6/15/2023	SLW	0.3	Review [REDACTED]
6/15/2023	SLW	0.3	Upon receipt of defendants' third revised third set of responses to plaintiffs' third set of document requests, review thereof
6/16/2023	EDR	0.3	Correspondence with defense counsel
6/16/2023	EDR	0.4	Correspondence with ILS regarding document collection
6/16/2023	EDR	4.1	Calls with [REDACTED]
6/16/2023	JBM	0.2	Attention to draft email from EDR to [REDACTED]
6/16/2023	JBM	0.5	Office conference with EDR regarding electronic discovery and review of ESI protocol in connection with same
6/16/2023	JBM	2	Attend discovery status conference and lead presentation for Plaintiff
6/16/2023	JBM	2	Travel from hearing and post-conference telephone conferences with SLW and EDR regarding electronic discovery matters
6/16/2023	JBM	2.2	Further preparation for hearing and traveling to hearing
6/16/2023	SLW	0.3	Conferring with [REDACTED]
6/16/2023	SLW	0.3	Communicating with [REDACTED]
6/16/2023	SLW	1.5	Prepare for and appear before Judge Krause on multiple disputed issues including particular time frame for scope of productions, and potential argument regarding ongoing injury and estoppel
6/16/2023	SLW	1.5	Meeting and conferring with both [REDACTED]
6/20/2023	EDR	0.4	Conference with S. Wittels [REDACTED]
6/20/2023	EDR	0.5	Conference with [REDACTED]
6/20/2023	EDR	0.8	Document collection from custodian
6/20/2023	EDR	0.8	Draft and file letter requesting ESI Protocol extension
6/20/2023	JBM	0.2	Office conference with EDR regarding ESI collection efforts and related calendaring matters
6/20/2023	JBM	0.2	Further call to D. Hutchinson

Date	Atty	Time	Description
6/20/2023	JBM	0.2	Review proposed extension application from EDR re email collections
6/20/2023	JBM	0.5	Review documents and call to D. Hutchinson re data discovery issues
6/20/2023	JBM	0.5	Draft email to opposing counsel re data fields and review EDR edits to same
6/20/2023	JBM	0.7	Review protective order and draft email correspondence to D. Hutchinson
6/20/2023	JBM	0.7	Telephone conference with EDR re Livanos group ESI collection
6/20/2023	JBM	1	Review sample data pull provided from Defendants and take notes on same
6/20/2023	NAR	0.5	Conference with E. Roman regarding case background, discovery responses
6/20/2023	NAR	0.5	Review discovery requests
6/21/2023	EDR	0.2	Coordinate document collection
6/21/2023	JBM	0.5	Attention to signed protective order from D. Hutchinson and email correspondence in connection with same
6/21/2023	JBM	0.7	Review email correspondence from opposing counsel re data discovery and analyze sample discovery regarding same
6/22/2023	EDR	1.9	Document collection and calls re: same
6/22/2023	JBM	0.7	Further review and analysis of potential damages data in preparation for call with D. Hutchinson
6/23/2023	EDR	0.5	Conference with B. McInturff and S. Wittels regarding document collection
6/23/2023	JBM	0.5	Telephone conference with SLW and EDR [REDACTED]
6/23/2023	JBM	2.2	Follow up review and analysis of Rule 68 case law
6/23/2023	SLW	0.1	Conferring with team regarding [REDACTED]
6/26/2023	EDR	0.5	Call with data expert
6/26/2023	EDR	0.9	Coordinate document collection and search terms
6/26/2023	JBM	0.2	Follow up review of charging data produced from Defendants
6/26/2023	JBM	0.5	Review documents in connection with video conference with data scientist D. Hutchinson
6/26/2023	JBM	0.5	Video conference with D. Hutchinson and EDR regarding damages calculations
6/26/2023	NAR	0.6	Review Defendant's discovery responses for third RFPs
6/27/2023	EDR	0.4	Correspondence with vendor regarding collection
6/27/2023	EDR	0.5	Correspondence with defense counsel regarding discovery
6/27/2023	EDR	2.4	Revise responses to third document requests
6/27/2023	EDR	2.4	Draft email regarding search terms and custodians
6/27/2023	JBM	0.2	Review of prior email correspondence and email to D. Hutchinson in connection with same
6/27/2023	JBM	0.7	Review and analysis of email correspondence from defense counsel re data production and office conference with EDR in connection with same
6/27/2023	NAR	0.8	Review and revise responses to third RFPs

Date	Atty	Time	Description
6/28/2023	NAR	1.6	Research case law re discovery for RFP responses
6/28/2023	NAR	1.8	Revise responses to third RFPs
6/29/2023	EDR	0.5	Call with vendor regarding search terms
6/29/2023	EDR	0.7	Draft letter to court regarding Livanos Group dismissal
6/29/2023	EDR	0.9	Draft, finalize and file voluntary dismissal for Livanos Group Plaintiffs
6/29/2023	EDR	1.3	Draft initial search terms
6/29/2023	EDR	1.6	Revise responses to third document requests
6/29/2023	EDR	3.2	Draft email regarding search terms and custodians
6/29/2023	JBM	0.2	Follow up review of search terms email
6/29/2023	JBM	1	Review and edit proposed search terms email from EDR and office conferences with EDR in connection with same
6/29/2023	SLW	0.3	Conferring with Bill Livanos and EDR [REDACTED]
6/29/2023	SLW	0.6	Review of ESI letter to defense counsel regarding custodians and hit report,
6/30/2023	EDR	0.3	Correspondence with defense counsel regarding discovery
6/30/2023	EDR	0.5	Call with vendor regarding production
6/30/2023	EDR	2.2	Revise responses to third document requests
6/30/2023	NAR	0.4	Review responses to third set of RFPs
6/30/2023	NAR	0.8	Draft response to third set of Interrogatories
6/30/2023	NAR	1.9	Draft responses to fourth set of RFPs
6/30/2023	SLW	0.4	Review draft letter to Court regarding voluntary dismissal and confer with EDR
7/5/2023	EDR	0.3	Revise letter to Judge Seibel regarding Livanos dismissal
7/5/2023	EDR	1.5	Revise and serve responses to Defendants' 3rd RFPs
7/5/2023	EDR	6.8	Review collected documents for responsiveness to document requests
7/5/2023	JBM	0.5	Office conference with EDR regarding Plaintiffs' responses to third discovery requests and review and edit same
7/5/2023	JBM	0.5	Attention to email correspondence between EDR and D. Hutchinson re database issues
7/5/2023	NAR	0.3	Review third RFP responses
7/5/2023	SLW	0.4	Review and edit of proposed letter to Judge Seibel regarding voluntary dismissal, and proposing changes for defendant's review prior to submission
7/5/2023	SLW	0.7	Review plaintiffs' responses to defendants' revised third set of discovery demands, and communicating with EDR regarding proposed changes
7/5/2023	TP	0.6	Reviewing responses to Defendants' 3rd RFPs
7/6/2023	EDR	0.2	Review letter requesting extension of meet and confer deadline regarding 3rd RFPs
7/6/2023	EDR	0.8	Meet and confer regarding custodians
7/6/2023	EDR	1.2	Correspondence with defense counsel regarding data production
7/6/2023	EDR	2	Research [REDACTED]
7/6/2023	EDR	2.1	Prepare for meet and confer
7/6/2023	JBM	0.2	Follow up conference with EDR and SLW re meet and confer

Date	Atty	Time	Description
7/6/2023	JBM	0.2	Review and edit EDR data email
7/6/2023	JBM	0.7	Office conferences with EDR and SLW in connection with same
7/6/2023	JBM	0.7	Further research and review in connection with meet and confer
7/6/2023	JBM	0.7	Attend and lead meet and confer
7/6/2023	JBM	1	Prepare for meet and confer and review documents and perform legal research on searching personal email accounts
7/7/2023	EDR	0.4	Prepare and produce documents
7/7/2023	EDR	2.1	Revise responses to 4th RFPs
7/7/2023	JBM	0.2	Attention to email correspondence from defense counsel and email from ESI vendor related to production issues
7/7/2023	NAR	0.3	Revise response to third set of Interrogatories
7/7/2023	NAR	1.1	Revise responses to fourth set of RFPs
7/8/2023	SLW	0.4	Upon receipt of Defendants' Revised Responses to Plaintiffs' Third Request for Production of Documents, review thereof
7/10/2023	EDR	2.3	Draft search terms counterproposal
7/10/2023	NAR	0.2	Calendar hearing and call with EDR re same
7/10/2023	NAR	0.5	Revise discovery responses and email JBM re same
7/11/2023	JBM	0.2	Review and analysis of D. Hutchinson agreement data analysis services
7/11/2023	JBM	0.5	Review of Judge Krause March 23 order re discovery disputes and email to defense counsel regarding same
7/11/2023	JBM	1.5	Review and analysis of MB responses to third discovery requests, transcript of June 16 conference, pre-conference submissions re June 16 conference, and outlining of deficiencies for meet and confer
7/11/2023	NAR	0.3	Review def letter motion re discovery, discuss same with EDR
7/11/2023	NAR	1.2	Research re interrogatory verification, discuss same with EDR, JBM
7/11/2023	SLW	0.3	Review Court order setting schedule for bench decision on MTD on 8-31-23 and confer with team
7/12/2023	EDR	0.3	Call with D. Forrest, B. McInturff regarding search terms counterproposal
7/12/2023	EDR	0.4	Draft letter regarding extension of filing deadlines
7/12/2023	EDR	1.4	Prepare for meet and confer
7/12/2023	EDR	1.7	Meet and confer with defense counsel regarding discovery responses
7/12/2023	EDR	4.3	Draft counterproposal for proposed search terms
7/12/2023	JBM	0.2	Call with D. Forrest and EDR re search terms
7/12/2023	JBM	0.2	Follow up review and analysis of outline for meet and confer
7/12/2023	JBM	0.2	Attention to SLW correspondence re ILS bills
7/12/2023	JBM	0.2	Follow up office conference with EDR re meet and confer matters
7/12/2023	JBM	0.2	Review EDR letter to J. Krause re extensions and email correspondence in connection with same
7/12/2023	JBM	0.5	Review and edit outline and further review of transcript in connection with same

Date	Atty	Time	Description
7/12/2023	JBM	0.5	Attention to SLW edits to Hyxabyte consulting agreement and email correspondence in connection with same
7/12/2023	JBM	0.5	Office conference with EDR regarding responses to discovery requests, meet and confer planning, and database and search terms issues
7/12/2023	JBM	0.5	Further preparation for meet and confer
7/12/2023	JBM	0.5	Telephone conference with SLW and EDR re amended discovery responses
7/12/2023	JBM	1	Compare language of current responses and objections with prior responses and objections
7/12/2023	JBM	1.5	Lead meet and confer with defense counsel
7/12/2023	JBM	1.7	Continued review and analysis of MB responses to third discovery requests, transcript of June 16 conference, pre-conference submissions re June 16 conference, and outlining of deficiencies for meet and confer
7/12/2023	SLW	0.4	Participate on meet and confer with defense counsel Eric P regarding ESI protocol for testing search terms, etc., and proposals for how to proceed given plaintiffs' withdrawal of custodians and plaintiffs' responses to discovery requests
7/13/2023	EDR	1.2	Finalize and serve responses to 4th RFPs, 3rd Interrogatories
7/13/2023	EDR	2.2	Draft amended responses to 3rd RFPs
7/13/2023	JBM	0.2	Attention to multiple emails re scheduling call with potential expert
7/13/2023	JBM	1	Review and edit Plaintiffs' 4th RFP responses and Plaintiffs' 3rd Interrogatory objections
7/13/2023	NAR	0.1	Review JBM redline of discovery responses
7/13/2023	SLW	0.1	Communicating with [REDACTED]
7/14/2023	EDR	0.3	Revise search terms proposal
7/14/2023	EDR	0.8	Correspondence with defense counsel regarding search terms
7/14/2023	EDR	2.7	Revise, finalize, and serve revised responses to 3rd RFPs
7/14/2023	JBM	0.5	Office conference with EDR re responding to defense counsel's post-confer email re outstanding disputes
7/14/2023	JBM	0.5	Attention to email correspondence from D. Forrest re search terms and email to EDR and review of documents in connection with same
7/14/2023	JBM	1	Review email correspondence from defense counsel re search terms process and contacts to absent class members and office conference with EDR to discuss [REDACTED]
7/14/2023	SLW	0.3	Review and edit of Plaintiffs' objections to Defendants' Third Interrogatories and Fourth RFPs
7/17/2023	EDR	0.7	Draft and send email regarding search terms and additional custodians
7/17/2023	EDR	1.1	Draft and send confirmatory email regarding meet and confer
7/17/2023	EDR	1.3	Draft and send counterproposal regarding search terms
7/17/2023	EDR	1.4	Meet and confer regarding plaintiffs 3rd RFPs, defendants 4th RFPs

Date	Atty	Time	Description
7/17/2023	JBM	0.2	Telephone conference with EDR and SLW [REDACTED]
7/17/2023	JBM	0.2	Review email correspondence with SLW for name of closed restaurant in White Plains
7/17/2023	JBM	0.2	Office conferences with EDR following same
7/17/2023	JBM	0.2	Edit EDR post-conferral email
7/17/2023	JBM	0.2	Edit EDR search terms email
7/17/2023	JBM	0.2	Draft letter to J. Krause re resolution of discovery dispute
7/17/2023	JBM	0.7	Further preparation for meet and confer and office conferences with EDR regarding same
7/17/2023	JBM	1	Review DJB research regarding [REDACTED]
7/17/2023	JBM	1.5	Prepare for meet and confer and review documents in connection with same
7/17/2023	JBM	1.5	Attend and lead meet and confer
7/17/2023	NAR	0.5	Revise email re search terms and emails re same with EDR
7/17/2023	SLW	0.4	Participate on meet and confer with defense counsel regarding outstanding issues on discovery, ESI, etc.
7/18/2023	EDR	0.3	Conference with B. McInturff regarding response to Defendants' letter motion on custodians
7/18/2023	EDR	0.3	Correspondence with ESI vendor regarding search terms
7/18/2023	EDR	0.4	Meet and confer regarding defendants 3rd RFPs
7/18/2023	EDR	1.9	Draft response to Defendants' letter motion requesting additional custodians
7/18/2023	EDR	3.3	Research for response to motion requesting additional custodians
7/18/2023	JBM	0.2	Attention to email correspondence from SLW re expert witness and office conference with EDR regarding same
7/18/2023	JBM	0.2	Organize case file documents
7/18/2023	JBM	0.2	Office conference with SLW regarding litigation strategy
7/18/2023	JBM	0.2	Prepare for meet and confer
7/18/2023	JBM	0.2	Attend meet and confer regarding Plaintiffs' responses to Defendants' 3rd RFPs
7/18/2023	JBM	0.2	Office conference with EDR regarding same
7/18/2023	JBM	0.7	Review email from defense counsel and draft response to same
7/19/2023	EDR	0.5	Call with ESI vendor regarding search term hit report
7/19/2023	EDR	1.1	Revise and serve responses to 3rd RFPs
7/19/2023	EDR	1.6	Revise response to Defendants' letter motion on custodians
7/19/2023	EDR	4.3	Draft response to Defendants' letter motion requesting additional custodians
7/19/2023	JBM	0.2	Telephone conference with SLW and EDR regarding same
7/19/2023	JBM	0.2	Follow up telephone conference with SLW regarding discovery matters
7/19/2023	JBM	0.2	Office and telephone conferences with EDR regarding same
7/19/2023	JBM	0.2	Review defense counsel email regarding additional custodians and email correspondence with EDR regarding same

Date	Atty	Time	Description
7/19/2023	JBM	0.5	Attention to emails from E. Prezbilko regarding discovery matters and office conferences with EDR regarding same
7/19/2023	JBM	0.7	Review and edit Defendant's proposed stipulation regarding Class Member PII and telephone conference with EDR and SLW regarding same
7/19/2023	JBM	1.2	Review ESI caselaw and perform internet research in connection with same
7/19/2023	JBM	2	Review and edit EDR draft of oppo to Defendants application to add custodians
7/20/2023	DJB	0.2	Call with EDR re [REDACTED]
7/20/2023	DJB	0.2	Call with JBM and EDR re [REDACTED]
7/20/2023	DJB	0.7	Revised letter re D's MTC
7/20/2023	DJB	1.4	Researched issue about [REDACTED]
7/20/2023	EDR	1.3	Prepare and serve hit report
7/20/2023	EDR	3.6	Revise, finalize, and file response to Defendants' letter motion on custodians
7/20/2023	JBM	0.5	Review of MB extension letter office and telephone conference with EDR re SLW edits to class member PII stipulation and revise and edit stipulation in connection with same
7/20/2023	JBM	0.5	Review and edit near-final draft letter response to MB additional custodian application
7/20/2023	JBM	1	Revise and edit EDR draft of additional custodians letter
7/20/2023	SLW	1	Review and edit proposed stipulation regarding contact by plaintiffs' counsel with proposed class members
7/21/2023	EDR	0.4	Correspondence with defense counsel regarding dispute over time period in RFPs
7/21/2023	EDR	0.6	Draft, finalize and file letter seeking extension for response to ECF No. 123
7/21/2023	EDR	0.8	Review and analyze Defendants' hit report
7/21/2023	EDR	1.2	Correspondence with defense counsel regarding database data production, custodians
7/24/2023	EDR	0.3	Email to defense counsel regarding search terms
7/24/2023	EDR	0.9	Revise search term counterproposal
7/24/2023	JBM	0.2	Attention to email correspondence from opposing counsel re data production and email to EDR in connection with same
7/25/2023	DJB	0.4	Call with EDR and JBM re [REDACTED]
7/25/2023	DJB	2.3	Researched [REDACTED]
7/25/2023	EDR	3.1	Draft response to Defendants' letter on time period for Plaintiffs' discovery
7/25/2023	JBM	0.2	Attention to emails from opposing counsel regarding contacting absent class members and third RFPs
7/25/2023	JBM	0.2	Email correspondence with defense counsel regarding same
7/25/2023	JBM	0.7	Office conference with EDR and DJB regarding [REDACTED]
7/26/2023	DJB	0.2	Call with EDR and JBM re [REDACTED]
7/26/2023	DJB	0.5	Researched [REDACTED]

Date	Atty	Time	Description
7/26/2023	EDR	0.3	Correspondence with data scientist regarding class data production
7/26/2023	EDR	0.8	Meet and confer regarding class member contact, data
7/26/2023	EDR	3.5	Draft response to Defendants' letter on limiting time period for discovery
7/26/2023	EDR	3.4	Research for response to letter on limiting time period for discovery
7/26/2023	JBM	0.2	Office conference with EDR in connection with same
7/26/2023	JBM	0.7	Proof and edit EDR draft of opposition letter and email correspondence with EDR regarding same
7/26/2023	JBM	1	Prepare for meet and confer and office conferences with EDR regarding same
7/26/2023	JBM	1	Lead meet and confer and follow up office conference with EDR regarding same
7/26/2023	JBM	1	Attention to email correspondence from defense counsel re class member contact stipulation and email to DJB in connection with same
7/26/2023	JBM	1	Review case law on [REDACTED]
7/26/2023	JBM	1.2	Follow up research and analysis of [REDACTED]
7/26/2023	JBM	1.5	Further revising and editing opposition to MB application
7/26/2023	JBM	2.2	Review and edit EDR draft of opposition to MB application to overrule Plaintiffs' objections to producing bottle bill discovery that pre-dates their relationship with Manhattan Beer
7/27/2023	DJB	0.3	Revised PII stipulation
7/27/2023	EDR	1.2	Research response to Defendants' letter on time period for Plaintiffs' discovery
7/27/2023	EDR	2.4	Draft response to Defendants' letter on time period for Plaintiffs' discovery
7/27/2023	EDR	2.5	Revise, finalize, and file response to Defendants' letter on time period for Plaintiffs' discovery
7/28/2023	EDR	0.7	Prepare for meet and confer
7/28/2023	EDR	0.8	Draft confirmatory email regarding meet and confer
7/28/2023	EDR	1.1	Meet and confer regarding search terms, data production
7/28/2023	EDR	1.4	Revise search terms pursuant to meet and confer
7/28/2023	EDR	1.5	Review and analyze search term reports
7/28/2023	SLW	0.1	Conferring with JBM regarding issue of pushing for discovery from MB as to non-class member deposit charges or deferring request
7/28/2023	SLW	0.6	Devising strategy and review caselaw [REDACTED]
7/29/2023	JBM	0.2	Office conference with EDR regarding data issues and search terms
7/29/2023	JBM	0.2	Prepare for search terms and data discovery meet and confer
7/29/2023	JBM	0.5	Review and edit DJB proposed stipulation re class member contact and transmit same to defense counsel
7/29/2023	JBM	1	Attend search term and data discovery meet and confer
7/31/2023	EDR	0.3	Correspondence with defense counsel regarding meet and confer
7/31/2023	EDR	1.4	Review and analyze exemplar invoices

Date	Atty	Time	Description
7/31/2023	EDR	1.4	Research work product for opposition to letter motion
7/31/2023	EDR	3.7	Review and analyze and revise search terms
7/31/2023	JBM	0.2	Attention to correspondence from defense counsel re cancelling meet and confer and office conference with EDR regarding same
8/1/2023	EDR	0.2	Correspondence with defense counsel regarding meet and confer
8/1/2023	EDR	0.3	Correspondence with e-discovery vendor regarding search term report
8/1/2023	EDR	0.4	Meet and confer with defense counsel
8/1/2023	EDR	0.7	Review and analyze Defendants' letter motion regarding time period of discovery
8/1/2023	EDR	1.2	Review and analyze exemplar invoices
8/1/2023	EDR	1.6	Research opposition to discovery time period letter motion
8/1/2023	JBM	0.2	Prepare for meet and confer
8/1/2023	JBM	0.2	Attend and lead meet and confer
8/1/2023	JBM	0.2	Email and office conference with EDR re meet and confer scheduling
8/1/2023	NAR	2.8	Research case law re reliance
8/1/2023	SLW	0.4	Review of proposed stipulation with Defendants regarding production of database data, as well as whether Plaintiffs can use information regarding potential class members in data base to contact non class members
8/2/2023	DJB	0.1	Call with JBM and EDR re MTC
8/2/2023	DJB	0.2	Call with JBM re MTC insert
8/2/2023	DJB	0.5	Reviewed proposed PII stipulation
8/2/2023	DJB	1.1	Researched PII cases
8/2/2023	EDR	0.3	Conference with N. Rice regarding fraud research
8/2/2023	EDR	0.4	Correspondence with defense counsel regarding interrogatories and data production
8/2/2023	EDR	0.6	Correspondence with defense counsel regarding search terms
8/2/2023	EDR	0.7	Draft third set in interrogatories to defendants
8/2/2023	EDR	0.9	Coordinate search term report with e-discovery vendor
8/2/2023	EDR	1.4	Draft opposition to Defendants' motion regarding discovery time period
8/2/2023	JBM	0.2	Attention to case-related emails and scheduling
8/2/2023	JBM	0.2	Telephone conference with SLW and EDR re motion to compel class member data potential expert witnesses and follow up conference with EDR regarding same
8/2/2023	JBM	0.2	Attention to email from defense counsel re contact of absent class members and office conference with EDR and DJB regarding same
8/2/2023	JBM	0.2	Revise and edit stipulation and transmit to defense counsel
8/2/2023	NAR	0.2	Call with EDR re reliance research
8/2/2023	NAR	3.4	Research case law re reliance and analyze same for EDR
8/2/2023	SLW	0.3	Upon filing by defendants, review of motion relating to discovery dispute related to non-bottle bill deposits charged to customers
8/3/2023	DJB	0.4	Reviewed PII stipulation
8/3/2023	EDR	0.2	Correspondence regarding data production

Date	Atty	Time	Description
8/3/2023	EDR	0.4	Review timeline of data production discussions with defense counsel
8/3/2023	EDR	4.2	Draft response to Defendants' letter on limiting time period for discovery
8/3/2023	EDR	1.4	Research for response to letter on limiting time period for discovery
8/3/2023	JBM	0.2	Telephone conference with SLW re named plaintiffs and letter motion practice
8/3/2023	JBM	0.2	Office conference with EDR re case strategy
8/3/2023	JBM	0.7	Attention to email correspondence from defense counsel re class member contact stipulation, emails with team regarding same, and review and finalization of stipulation
8/3/2023	JBM	0.7	Office conference with EDR regarding [REDACTED]
8/3/2023	JBM	1	Begin outlining letter application re class member data that does not involve disputed charge
8/3/2023	JBM	1	Continued drafting and editing of application
8/3/2023	JBM	1	Assemble and review documents in connection with letter application and further review of email correspondence with opposing counsel regarding same
8/3/2023	JBM	1.5	Perform legal research into discovery standards and update outline in connection with same
8/3/2023	JBM	1.5	Begin drafting letter application re class member data and review email correspondence and court discovery order in connection with same
8/3/2023	JBM	2.2	Perform legal research on discovery case law and revise and edit letter application re class member data in connection with same
8/4/2023	EDR	0.2	Sign [REDACTED]
8/4/2023	EDR	0.4	Prepare exhibits for data production letter motion
8/4/2023	EDR	0.5	Finalize and file no time limit discovery letter motion
8/4/2023	EDR	0.7	Finalize and file data production letter motion
8/4/2023	EDR	1.7	Revise opposition to no time limit discovery letter motion
8/4/2023	EDR	2.3	Revise data production letter motion
8/4/2023	JBM	0.2	Telephone conference with D. Hutchinson re data analysis
8/4/2023	JBM	0.7	Review and edit letter
8/4/2023	JBM	0.7	Review and make final edits to opposition to discovery regarding other beer distributors
8/4/2023	JBM	1	Do final read and make final edits to letter application re class member data and check exhibits in connection with same
8/4/2023	JBM	1.7	Review of prior email correspondence and meet and confer notes on agreements re data production and revise and update letter application re class member data production
8/4/2023	JBM	2.2	Office conferences with EDR regarding letter and continued drafting of letter application re class member data and perform legal research into [REDACTED]
8/4/2023	JBM	2.5	Further review of discovery case law and update letter in connection with same

Date	Atty	Time	Description
8/4/2023	JLH	0.5	Edit second discovery letter and send to JBM
8/4/2023	JLH	0.7	Edit first discovery letter and send to EDR
8/7/2023	EDR	0.2	Correspondence with defense counsel regarding extension and meet and confer on search terms
8/7/2023	EDR	0.3	Review Defendants' letter regarding request for extension
8/8/2023	EDR	1.3	Review and analyze production
8/8/2023	JBM	0.7	Attention to D. Hutchison analysis of MB data and email correspondence and office conference with EDR regarding same
8/8/2023	JLH	0.1	Review D. Hutchison data analysis
8/8/2023	TP	1.3	Review D. Hutchison data analysis
8/8/2023	TP	1.6	Review casefile and prior correspondence with defense counsel in preparation for taking over damages discovery
8/9/2023	EDR	0.3	Correspondence regarding data call
8/9/2023	EDR	0.6	Conference with J. Hunter and T. Palikovic regarding data
8/9/2023	EDR	0.8	Strategize regarding mediation
8/9/2023	EDR	1.5	Call with D. Hutchison regarding data
8/9/2023	JBM	0.2	Telephone conference with EDR & TP re data strategy
8/9/2023	JBM	0.7	Further review of D. Hutchinson documents in connection with same
8/9/2023	JLH	0.1	Call w EDR, TP re data
8/9/2023	JLH	0.1	Call w T. Palikovic re spearheading data analysis project
8/9/2023	JLH	0.6	Call w EDR, TP re data
8/9/2023	JLH	1.5	Call w EDR, TP, and Daren Hutchinson re data
8/9/2023	TP	0.2	Conference with EDR and JBM re data analysis issues
8/9/2023	TP	0.8	Multiple conferences with EDR and JLH regarding data analysis
8/9/2023	TP	0.8	Additional review of D. Hutchison data analysis
8/9/2023	TP	1.2	Attention to data productions and history of correspondence with defense counsel re same
8/9/2023	TP	1.4	Reviewing discovery requests and responses in preparation for call with D. Hutchison
8/9/2023	TP	1.5	Conference with JLH, EDR and D. Hutchinson regarding data analysis
8/10/2023	EDR	0.9	Review and analyze search terms
8/10/2023	TP	1.8	Review documents and discovery responses in connection with data analysis
8/10/2023	TP	2.1	Review data analyses done to date and outline issues and gaps to focus on
8/14/2023	JBM	0.2	Correspondence with EDR and opposing counsel re search terms meet and confer
8/14/2023	JBM	0.7	Review J. Krause rules and protective order re confidentiality of public proceedings
8/15/2023	EDR	0.8	Revise proposed search terms
8/15/2023	EDR	1.1	Correspondence with data scientist
8/15/2023	EDR	1.6	Meet and confer regarding search terms
8/15/2023	EDR	2.9	Prepare for search terms meet and confer

Date	Atty	Time	Description
8/15/2023	JBM	0.2	Office conference with EDR regarding data issues and meet and confer and 8/16 conference
8/15/2023	NAR	0.2	Call with EDR re meet and confer
8/15/2023	NAR	1.5	Attend meet and confer
8/15/2023	SLW	3.1	Analysis of motion by defendants, and motion by plaintiffs related to discovery including time period, email collection of four Village Social custodians, and plaintiffs' application to have full files of class members and not just those files showing payment of \$1.30 charges
8/15/2023	TP	0.2	Prepare for meet and confer re search terms
8/15/2023	TP	0.3	Correspondence with D. Hutchison re data analysis of individual invoices in connection for upcoming conference
8/15/2023	TP	1.6	Meet and confer regarding search terms
8/16/2023	EDR	0.6	Prepare for court conference
8/16/2023	EDR	2.7	Review and analyze search terms
8/16/2023	SLW	1.8	Appearing before Judge Krause in White Plains regarding August 15 separate parties' applications and arguing plaintiffs' position
8/18/2023	EDR	1.6	Review and analyze search terms
8/21/2023	EDR	0.3	Conference with J. Hunter regarding data analysis
8/21/2023	EDR	0.4	Correspondence with defense counsel regarding search terms
8/21/2023	EDR	1.7	Review and analyze documents for production
8/21/2023	TP	0.8	Post conferral outline of notes and questions for D. Hutchison re data analysis
8/21/2023	TP	1.1	Call with D. Hutchison and preparation for same
8/22/2023	EDR	2.1	Review and analyze transcript from court hearing
8/22/2023	JBM	0.7	Email correspondence with potential named plaintiff re retainer information next steps
8/22/2023	JLH	0.1	Email to D. Hutchison re scheduling call to discuss data analysis
8/22/2023	TP	0.3	Attention to correspondence with D. Hutchison re status of data analysis and outstanding questions
8/23/2023	EDR	0.3	Correspondence with vendor regarding search terms
8/23/2023	EDR	1	Conference with data scientist regarding data analysis
8/23/2023	EDR	4.4	Review documents for responsiveness to Defendants' document requests
8/23/2023	JBM	0.7	Review and analysis of invoices from ILS and email correspondence with SLW regarding same
8/23/2023	JLH	1	Confer w EDR and D. Hutchinson re data analysis
8/24/2023	EDR	0.3	Correspondence with B. McInturff regarding search terms
8/24/2023	EDR	0.4	Correspondence with vendor regarding search terms
8/24/2023	EDR	0.4	Draft email to defense counsel regarding search terms
8/24/2023	EDR	0.6	Draft search terms for Buetti review per Court order
8/24/2023	EDR	0.6	Prepare updated search term report and send to defense counsel
8/24/2023	EDR	4.9	Review documents for responsiveness to Defendants' document requests
8/24/2023	NAR	0.2	Download and file ECF notices

Date	Atty	Time	Description
8/25/2023	EDR	1.3	Conference with data scientist regarding data analysis
8/25/2023	EDR	6.6	Review documents for responsiveness to Defendants' document requests
8/25/2023	JBM	0.5	Email correspondence to potential Named Plaintiff
8/25/2023	JLH	0.1	Review and respond to email from D. Hutchinson re data analysis
8/25/2023	JLH	1.3	Confer w EDR and D. Hutchinson re data analysis
8/28/2023	EDR	0.4	Review and analyze data production
8/28/2023	EDR	7.6	Review documents for responsiveness to Defendants' document requests
8/28/2023	SLW	1.3	After call received from Peter R, discussing issues of defense attorneys with authority to mediate, and Arden estimate, emailing team with updated info from call
8/29/2023	EDR	0.4	Draft and send retainer to new client
8/29/2023	EDR	1.2	Analyze document collection for documents regarding other beverage distributors
8/29/2023	EDR	1.8	Draft list of search terms for native email review
8/30/2023	EDR	0.5	Review and analyze Defendants' search terms proposal
8/30/2023	EDR	1.4	Prepare for August 31 hearing
8/30/2023	JBM	0.7	Attention to emails regarding [REDACTED]
8/30/2023	SLW	0.3	Upon receipt, review of defendants' third revised request responding to Plaintiffs' Third request for production of documents
8/30/2023	TP	0.8	Attention to Defendants' revised responses to Pls' 3rd RFPs
8/31/2023	EDR	3.8	Travel to and from hearing on motion to dismiss
8/31/2023	EDR	2.3	Attend Court hearing on motion to dismiss
8/31/2023	JBM	0.2	Review EDR edits to discovery plan and office conference with EDR regarding same
8/31/2023	JBM	0.2	Review and analysis of Defendant's responses to third interrogatories
8/31/2023	JBM	0.2	Office conference with EDR re Defendant's responses to third interrogatories
8/31/2023	JBM	0.7	Attention to correspondence from EDR re MTD hearing and responses to same
8/31/2023	JLH	0.1	Confer w EDR re outcome of hearing
8/31/2023	JLH	0.1	Confer w EDR, DJB, and NAR re outcome of hearing
8/31/2023	NAR	0.5	Discuss MTD ruling with team
8/31/2023	SLW	1.3	Preparing for and appearing before Judge Seibel in White Plains on bench decision regarding Defendants' motion to dismiss, and proffering arguments to Judge regarding potential settlement, and receive oral bench decision denying for most part defendants' motion to dismiss and maintaining RICO and GBL claims
9/1/2023	EDR	0.9	Correspondence with defense counsel regarding search terms
9/1/2023	EDR	1.1	Draft third amended complaint
9/1/2023	EDR	2.4	Review and analyze Defendants' search terms proposal
9/1/2023	NAR	0.6	Review and revise email re search terms
9/5/2023	EDR	0.4	Conference with S. Wittels regarding amending complaint and native email searches

Date	Atty	Time	Description
9/5/2023	EDR	0.4	Correspondence with database scientist regarding invoices for proposed stipulation
9/5/2023	EDR	0.7	Review and analyze invoices for proposed stipulation
9/5/2023	EDR	2.4	Draft email to defense counsel regarding scope of discovery following August 16 conference
9/6/2023	EDR	0.5	Revise case management plan
9/6/2023	EDR	0.9	Draft email to defense counsel regarding scope of ESI collection
9/6/2023	EDR	2.7	Review and analyze documents for responsiveness
9/6/2023	SLW	0.7	Upon receipt, review and analysis of defendants' responses to plaintiffs' third set of interrogatories, as well as proposed amendments by defendants to discovery schedule previously approved by Judge Krause
9/7/2023	EDR	0.3	Correspondence with defense counsel regarding revised case management schedule
9/7/2023	EDR	0.6	Conference with S. Wittels regarding email collection
9/7/2023	EDR	2	Review and analyze documents for responsiveness
9/7/2023	TP	0.7	Attention to D. Hutchison data cross-check analyses and correspondence re same
9/8/2023	DJB	0.1	Call with JBM re PII stipulation
9/8/2023	EDR	0.5	Conference with B. McInturff, T. Palikovic regarding strategy moving forward
9/8/2023	EDR	0.7	Correspondence with defense counsel regarding invoice stipulation
9/8/2023	EDR	1	Review and analyze documents for responsiveness
9/8/2023	JBM	0.2	Attention to EDR email re mediation and respond to same
9/8/2023	JBM	0.2	And Email correspondence with potential plaintiff re status
9/8/2023	TP	0.5	Conference with SLW and EDR regarding discovery strategy and tasks
9/9/2023	SLW	0.3	Consideration of new mediation proposal to defendants in light of Court's denial of defendants' motion to dismiss
9/11/2023	EDR	0.2	Correspondence with defense counsel regarding search terms
9/11/2023	EDR	0.3	Conference with B. McInturff, D. Forrest regarding search terms
9/11/2023	EDR	0.3	Email to vendor regarding regular expression search term
9/11/2023	EDR	0.4	Conference with S. Wittels, B. McInturff regarding mediation
9/11/2023	EDR	0.5	Correspondence with defense counsel regarding regular expression search term
9/11/2023	EDR	1	Meet and confer regarding search terms
9/11/2023	EDR	1.2	Draft confirmatory email regarding meet and confer
9/11/2023	EDR	2.4	Prepare for meet and confer
9/11/2023	JBM	0.2	Prepare for meet and confer re search terms
9/11/2023	JBM	0.2	Attention to invoices from eDiscovery vendor
9/11/2023	JBM	0.2	Follow up office conference with EDR regarding same
9/11/2023	JBM	0.2	Office conferences with EDR in connection with same
9/11/2023	JBM	0.2	Continued review and research on sampling matters (.75) telephone call with D. Forrest re real language searching
9/11/2023	JBM	0.2	Telephone conference with EDR and SLW re settlement issues

Date	Atty	Time	Description
9/11/2023	JBM	0.2	Follow up office conference with EDR regarding same
9/11/2023	JBM	0.2	Telephone conference with D. Hutchinson re sampling matters
9/11/2023	JBM	0.2	Office conference with EDR regarding same
9/11/2023	JBM	0.5	Revise and edit same and transmit same to EDR
9/11/2023	JBM	0.7	Attend search terms meet and confer
9/11/2023	JBM	0.7	Follow up email correspondence with D. Hutchinson regarding same and compile documents in connection with same
9/11/2023	JBM	1	Perform internet research on [REDACTED]
9/11/2023	JBM	1	Further document review and drafting of template sampling protocol to use in connection with search terms sample
9/11/2023	JBM	1.2	Review of files and internet research on sampling protocols for disputed search term documents
9/11/2023	SLW	0.4	Participating at meet and confer with defense counsel
9/12/2023	EDR	0.2	Correspondence with ILS regarding regular expression search term
9/12/2023	EDR	0.3	Conference with ILS regarding regular expression search term
9/12/2023	EDR	0.3	Correspondence with defense counsel regarding regular expression search term
9/12/2023	JBM	0.2	Office conference with TP, JLH, and EDR re damages model strategy
9/12/2023	JBM	0.2	Attention to invoices from ILS
9/12/2023	JBM	0.5	Telephone conference with D. Hutchinson re sampling and office conference with EDR regarding same
9/12/2023	JBM	0.5	Follow up call with D. Hutchinson and review of email from same
9/12/2023	JLH	0.2	Confer w JBM, TP re data analysis for mediation
9/12/2023	TP	0.2	Conference with JBM, JLH and EDR regarding damages strategy
9/12/2023	TP	2.4	Review and analysis of damages calculation methodology issues
9/13/2023	EDR	1.4	Correspondence with defense counsel regarding sampling
9/13/2023	EDR	1.4	Correspondence with defense counsel regarding search terms
9/13/2023	JBM	0.2	Office conference with EDR regarding sampling methodology
9/13/2023	JBM	0.7	Update draft sampling methodology and email EDR regarding same
9/13/2023	SLW	0.3	Conferring with EDR regarding email searches, and review communications with ESI expert Tony Chu [REDACTED]
9/14/2023	EDR	0.4	Email to defense counsel requesting extension of deadline to provide hit report of Bueti emails
9/14/2023	EDR	1.9	Coordinate email collection
9/14/2023	JBM	0.2	Attention to correspondence re mediation and office conference with EDR regarding same
9/14/2023	JBM	0.2	Review defense response to sampling protocol and email to EDR and NAR regarding same
9/14/2023	JBM	0.5	Attention to email from expert consultant and email to SLW regarding same
9/14/2023	SLW	0.1	Conferring with expert Darrell Hutchinson at Hexabyte
9/14/2023	SLW	0.7	Communicating with [REDACTED]

Date	Atty	Time	Description
9/15/2023	EDR	0.5	Coordinate J. Bueti email collection
9/15/2023	JBM	0.2	Office conference with TP in connection with same
9/15/2023	JBM	1	Research and draft pre-mediation letter and review documents in connection with same
9/15/2023	TP	0.2	Conference with JBM regarding mediation strategy
9/15/2023	TP	1.2	Attention to dismissal briefing in connection with assessing mediation strategy
9/16/2023	SLW	0.2	Confer with JBM regarding potential settlement
9/16/2023	SLW	0.2	Conferring with EDR regarding [REDACTED]
9/18/2023	EDR	0.2	Coordinate J. Bueti email collection
9/18/2023	JBM	0.2	Telephone conference with EDR and then TP regarding workflow
9/18/2023	JBM	0.2	Finalize and transmit letter to defense counsel
9/18/2023	JBM	0.5	Review SLW edits to mediation letter and edit letter
9/18/2023	JBM	1	Perform follow up internet research [REDACTED]
9/18/2023	SLW	1.2	Editing letter to defense counsel regarding latest settlement parameters and proposals for mediation
9/18/2023	TP	0.2	Conference with EDR and JBM regarding upcoming assignments
9/18/2023	TP	0.3	Attention to case file and upcoming calendar in connection with planning upcoming tasks
9/19/2023	EDR	0.2	Correspondence with defense counsel regarding search terms
9/19/2023	EDR	0.3	Conference with S. Wittels regarding Bueti email collection
9/19/2023	EDR	0.6	Correspondence with vendor regarding Bueti email searches
9/19/2023	EDR	1.4	Draft Third Amended Complaint
9/19/2023	EDR	3.9	Travel and perform J. Bueti email collection
9/19/2023	JBM	0.5	Attention to email from expert research firm and email correspondence with SLW in connection with same
9/19/2023	SLW	0.7	Conferring with EDR regarding data collection from Joe Bueti in Mt Kisco at Village Social and strategy regarding Third Amended Complaint
9/20/2023	EDR	0.2	Conference with B. McInturff, T. Palikovic regarding CAFA and RICO research
9/20/2023	EDR	0.2	Send data-related emails to T. Palikovic
9/20/2023	JLH	0.1	Confer w JBM and EDR re data analysis
9/20/2023	SLW	1.5	Editing and revising Plaintiffs' Third Amended Complaint to be filed with permission of Court to include allegations against RICO defendants Bergson and McCarthy including incorporation of defendants' admissions in response to first set of interrogatories
9/20/2023	TP	1.4	Review of EDR discovery summary and case file in connection with deciding next steps for damages discovery and analysis.
9/21/2023	EDR	0.2	Conference with S. Wittels regarding Bueti email searches
9/21/2023	EDR	0.2	Review and analyze hit report for F. Bueti emails
9/21/2023	EDR	0.4	Finalize and file Third Amended Complaint
9/21/2023	JBM	0.2	Review documents in connection with same

Date	Atty	Time	Description
9/21/2023	JBM	0.5	Attention to email correspondence re mediation
9/21/2023	JBM	0.7	Review prior correspondence with defense counsel and office conference with DJB re Defendant's delay in providing key initial discovery
9/21/2023	JBM	1	Review proposed TAC redlines and email EDR and NAR regarding same
9/21/2023	JBM	1	Review DJB mediation case description and revise and edit same
9/21/2023	NAR	1.6	Review and revise third amended complaint and discuss same with EDR
9/21/2023	SLW	0.4	Review of data summary production of Frank Bueti hit report and strategy for response to defendants
9/22/2023	EDR	0.2	Conference with S. Wittels regarding F. Bueti search term report
9/22/2023	EDR	0.2	Review S. Wittels draft email regarding mediation
9/22/2023	EDR	0.4	Conference with T. Palikovic regarding data analysis
9/22/2023	EDR	0.9	Correspondence with defense counsel regarding F. Bueti search term report
9/22/2023	SLW	0.9	In response to defendants' refusal to engage in any further dialogue re potential mediation, drafting counter proposal
9/22/2023	TP	0.6	Preparation for and conference with EDR regarding data analysis issues
9/22/2023	TP	1.2	Review of data analysis to date and outline issues regarding same
9/23/2023	SLW	0.4	Reviewing and edit of proposed email to defense counsel regarding Bueti emails
9/24/2023	TP	0.2	Attention to SLW correspondence to defense counsel regarding refusal to engage in pre-mediation process
9/25/2023	EDR	0.3	Correspondence with vendor regarding search term reports
9/25/2023	EDR	0.3	Correspondence with defense counsel regarding search term reports
9/26/2023	NAR	0.5	Update calendar and filings folder
9/27/2023	EDR	0.3	Serve verified interrogatory responses for Cap 111
9/27/2023	SLW	0.1	Review defense rejection of plaintiffs' latest mediation counterproposal
9/28/2023	EDR	1.3	Review and analyze Defendants' proposal regarding Bueti email search
9/29/2023	EDR	0.2	Correspondence with vendor regarding Bueti search term reports
9/29/2023	EDR	0.4	Correspondence with defense counsel regarding results of sampling
9/29/2023	EDR	1.1	Correspondence with defense counsel regarding Bueti custodians and scope of review
10/2/2023	EDR	0.3	Correspondence with vendor regarding Bueti search term reports
10/2/2023	EDR	2.4	Review and analyze transcripts for follow ups to raise with Magistrate Judge Krause
10/3/2023	EDR	0.4	Conference with B. McInturff, T. Palikovic regarding data production
10/3/2023	EDR	0.7	Correspondence with defense counsel regarding search terms
10/3/2023	TP	0.4	Conference with JBM and EDR regarding data production
10/4/2023	EDR	0.2	Review and analyze proposed stipulation regarding invoices

Date	Atty	Time	Description
10/4/2023	SLW	0.3	Review communications involving Joe Bueti emails, and attempted mediation between parties as well as resolution of search review by parties without court intervention
10/5/2023	JBM	0.2	Office conference with EDR and SLW to discuss strategy re upcoming conference
10/6/2023	DJB	0.5	Call with JBM re home state exception to CAFA
10/6/2023	EDR	0.3	Revise joint letter to court regarding Oct. 12 conference
10/6/2023	EDR	0.3	Conference with B. McInturff regarding litigation strategy
10/6/2023	EDR	0.5	Revise declaration and stipulation regarding invoices
10/6/2023	JBM	0.5	Office conferences with EDT and TP re RICO strategy and damages
10/6/2023	JBM	0.7	Legal and internet research on CAFA as jurisdictional
10/6/2023	JBM	1	Review defense counsel proposed stipulation re named plaintiff invoices and office conference with EDR regarding same
10/6/2023	JBM	1.5	Review prior J. Krouse hearing transcripts regarding database discovery dispute and office conferences with EDR regarding same
10/6/2023	TP	0.5	Conference with JBM regarding RICO strategy and research
10/10/2023	DJB	2.5	Researched CAFA home state exception
10/10/2023	EDR	0.3	Correspondence with defense counsel and court regarding conference scheduling
10/10/2023	EDR	0.3	Conference with N. Rice regarding RICO research
10/10/2023	EDR	0.6	Correspondence with vendor regarding document review set
10/10/2023	JLH	2	Reviewing [REDACTED]; drafting related email to JBM
10/10/2023	NAR	0.3	Call with EDR re research
10/10/2023	NAR	0.4	Review correspondence with Defendants re discovery
10/10/2023	TP	0.8	Post-conferal outline of notes and questions re data analysis next steps
10/10/2023	TP	2.4	Preparation for and call with D. Hutchison re data analysis
10/11/2023	DJB	0.1	Call with JBM re home state exception to CAFA
10/11/2023	DJB	0.3	Research into CAFA home state exception
10/11/2023	EDR	0.4	Send defendants' production to ILS
10/11/2023	EDR	0.5	Review stipulation and declaration regarding invoices and send signed stipulation to defense counsel
10/11/2023	SLW	1.3	Upon receipt from defendants, review defense counsel's Manhattan Beer privilege log, as well as defendants' third document production
10/12/2023	EDR	0.2	Conference with N. Rice regarding document requests, privilege log
10/12/2023	NAR	0.1	Call with EDR re answer and discovery requests
10/12/2023	NAR	0.9	Review answer to TAC and discovery requests
10/12/2023	NAR	1.6	Research re RICO elements
10/12/2023	TP	0.8	Review and analysis of D. Hutchison correspondence clarifying method of analysis for completeness of invoices
10/13/2023	EDR	0.1	Conference with T. Palikovic regarding data analysis
10/13/2023	EDR	0.4	Conference with N. Ric regarding RICO research
10/13/2023	JBM	1	Review of Answer
10/13/2023	NAR	3.1	Research RICO pleading issues

Date	Atty	Time	Description
10/13/2023	SLW	0.3	Review of defendants' Answer to third amended complaint with affirmative defenses
10/13/2023	SLW	0.4	Upon receipt of Defendants' response to our proposed mediation proposal, review thereof and drafting response
10/13/2023	TP	0.6	Review answer
10/13/2023	TP	0.6	Review of Defendants' discovery requests
10/16/2023	EDR	0.6	Review and analyze RICO research
10/16/2023	EDR	1.2	Review and analyze assumptions and rules in data analysis
10/16/2023	NAR	1.2	Draft analysis of RICO issues for EDR
10/16/2023	NAR	3.8	Research RICO pleading issues
10/17/2023	EDR	0.2	Conference with S. Wittels and B. McInturff regarding response to mediation proposal
10/17/2023	NAR	0.8	Research RICO pleading issues
10/17/2023	SLW	0.3	Review and confer with team potential response to defendants' explanatory reply regarding not wishing to mediate under proposed terms by plaintiffs
10/17/2023	SLW	0.3	Communicating with potential mediators re availability
10/19/2023	JBM	0.2	Telephone conference with TP regarding data issues
10/19/2023	JBM	0.2	Office conference with NAR re assignments
10/19/2023	JBM	1	Attention to [REDACTED]
10/19/2023	TP	0.2	Call with JBM regarding data analysis issues
10/20/2023	EDR	0.6	Correspondence with defense counsel regarding search terms and test the rest
10/20/2023	EDR	0.7	Revise, finalize, and serve 4th RFPs
10/20/2023	EDR	5.1	Review collected documents for responsiveness to document requests
10/20/2023	NAR	0.6	Review Defendants' answer to TAC
10/20/2023	NAR	0.9	Draft fourth set of RFPs
10/20/2023	SLW	0.4	Participate on meet and confer with defense counsel on issues including refund deposit account
10/23/2023	EDR	1.1	Draft emails to defense counsel regarding data production
10/23/2023	EDR	1.7	Conference with data scientist regarding data analysis
10/23/2023	NAR	0.2	Call with TP re prejudgment interest research
10/23/2023	SLW	1.8	Telephone conference with ILS data expert Darren, TP, and EDR regarding data findings, and formulate strategy for discovery
10/23/2023	TP	0.2	Conference with NAR regarding calculation of prejudgment interest research
10/23/2023	TP	0.5	Preliminary research regarding prejudgment interest calculation
10/23/2023	TP	2.5	Preparation for and conference with D. Hutchison, EDR and SLW re data analysis
10/24/2023	EDR	0.4	Revise mediation counterproposal
10/24/2023	NAR	0.8	Research re prejudgment interest rates